Guildford borough Submission
Local Plan: strategy and sites

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

December 2017

Document 7 of 12

Sections covered
Policy A26: Blackwell Farm, Hogs Back, Guildford
Policy A59: New rail station at Guildford West (Park Barn)
Policy A27: Warren Farm, White Lane, Ash Green
Policy A28: Land to the east of White Lane, Ash
Policy A29: Land to the south and east of Ash and Tongham
Policy A30: Land for new road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station, Ash
Policy A31: Land north east of Spoil Lane, Tongham
Policy A32: Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford
Policy A33: The University of Law, Guildford
Policy A34: Broadford Business Park, Shalford
Policy A35: Former Wisley airfield, Ockham
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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: A26 - Blackwell Farm, Hogs Back, Guildford
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPS16/4504  Respondent: 8553985 / Alastair Knowles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

My name is Alastair Knowles, I strongly object to the new build at Blackwell farm, as this will impact on the failing infrastructure we have in place at the moment. The roads and volume traffic cannot cope now, so by adding to this will cause

More gridlocks up and down the A3, backing up into Guildford.

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

Attached documents:

Comment ID: PSLPS16/8114  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

A26: Blackwell Farm

See comments on questions 1 to 3

See Appendix 4

Oppose road development in the AONB

Policy on green approaches needs strengthening

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

Attached documents:

Comment ID: pslp172/4909  Respondent: 8557217 / Mrs Angela Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/3435  Respondent: 8557985 / Artington Parish Council (Philip Gorton)  Agent: Green Balance

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

1. The Save Hogs Back response to the June 2016 Pre-Submission Consultation (Regulation 19) provided a comprehensive set of reasons why the Blackwell Farm strategic development allocation was so unacceptable that the Council should not proceed with it. Apart from the serious environmental damage it would do, we questioned whether it was practicable. The June 2017 Consultation indicates both the determination of the Council to press ahead with this extraordinarily inappropriate scheme and also that it is trying to deny the implausibility of the development proceeding, if at all, without appalling consequences. Modest amendments have been made to various policies in the Plan, but collectively they demonstrate that after another 12 months of searching the Council has still found no solutions to the problems we identified.

2. The unresolved problems centre on access and egress. Although pitched as an urban extension to Guildford (in the Spatial Vision, in Policy A26 and in paragraphs 4.1.8 and 4.6.24), Blackwell Farm has proved impractical to integrate into the town despite its physical proximity. There are many facets to this, the main ones being:

- the Blackwell Farm development cannot proceed without the capacity of the A3 trunk road being increased to bolster the strategic route in and out of Guildford, and the possibility of this happening is unknown;
- movement between the development area and Guildford, which is already extremely congested, would be substantially more impeded by the development;
- alternative means of access to the development area would have both significant practical problems and significant adverse consequences for the highway network;
- the ‘Sustainable Movement Corridor’ to tackle that congestion is most unlikely to be effective on the scale necessary to resolve access issues and will fail in its key role of reducing congestion;
- the combined effect of the Blackwell Farm development and the A3 widening through Guildford (itself needed in part because of Blackwell Farm) would be to raise substantially the Nitrogen Dioxide levels in Compton on the B3000 still further above legal limits at the most polluted point in the Borough.

In each case the Proposed Submission Local Plan has wholly failed to show that the Blackwell Farm development is practicable. We examine these in more detail below, after showing that the pressure on the road network in the vicinity of Blackwell Farm will be discernibly greater than forecast only one year ago.

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Traffic generation in relation to road capacity

3. Mouchel have pointed out, in advice submitted by Highways England in response to the Proposed Local Plan 2016, that there are significant limitations in the evidence presented in the Strategic Highways Assessment Report (SHAR) accompanying the Proposed Submission Plan in June 2016 which affect Blackwell Farm:

- the traffic generation model used in the Local Plan allows no merge delay at junctions: this is clearly not the case at present and is not claimed by GBC to be the case even after new road infrastructure has been built. As Mouchel point out, the effect of the model is to make the A3 and A31 particularly attractive roads because they are assumed to be readily accessible and to draw traffic towards them, whereas in reality there will be less ready access and greater use of the local road network;
- the model uses average peak period traffic movement figures across the three hour period 07.00-10.00, which will tend to understate movements in the true peak hour (circa 08.00-09.00). That will have a significant impact on congestion during periods when the network is most heavily used and, in the vicinity of Blackwell Farm, overloaded.

4. The SHAR indicated that the total vehicle generation anticipated by the whole Blackwell Farm development would be 717 vehicles leaving in the weekday average morning peak hour (Table 3.3, zone 576). How these vehicles would get out of Blackwell Farm has still not been properly resolved. Policy 26 includes a Plan showing an access to the development site (indeed the only access to the development site) from the A31 at its junction with the very minor road called Down Place. In June 2016 the Local Plan stated that this would be the “Primary vehicular access to the site allocation”. This would “provide a new route to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital.”

5. The Local Plan 2016 identified that a “Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue”. The word ‘preferably’ is instructive because it indicates that it was unclear in June 2016 how Blackwell Farm would be connected into Guildford. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. On the assumption that a means of direct access would be found, the SHAR identified distribution of Blackwell Farm traffic to the network of 342 trips eastbound towards Guildford and 375 trips southbound to the A31 in the morning weekday peak hour.

6. Figure 4.3 of the SHAR estimates traffic on the principal arms of the local network with Blackwell Farm development in place including the link to the A31. This Figure shows that 1,803 vehicles would attempt to enter the Egerton Road/ Gill Avenue crossroads by the Hospital in the peak morning weekday hour (one every two seconds). The 342 eastbound vehicles generated by the Blackwell Farm development would account for 19% of the post-scheme traffic on the junction (23% growth on pre-scheme traffic), neglecting the impact of any rat-running traffic. Users of the road would consider this scale of traffic growth implausible and unacceptable given the high level of congestion there at present. The SHAR confirms that the level of congestion on Egerton Road in the morning peak will be substantially worse than at present and will exceed its capacity with the development and its access roads in place (Scenario 3). Table 4.4 (Row 25) shows that Egerton Road eastbound will have a ratio of flow to capacity (RFC) of 0.92 resulting in a level of service with ‘unstable flow operating at capacity’. Table 4.12 (Row 8) shows that Egerton Road westbound will have a RFC of 1.21 (compared with about 1.04 now) resulting in the worst possible level of service with ‘forced or breakdown of flow’. In other words, it simply won’t work. The figures already smooth the morning peak hour figures over a three hour average, as Mouchel noted, so actual congestion in the peak would be worse than these indicators, even assuming zero rat-running traffic.

7. The network effects described in Figure 4.3 of the SHAR omit potential rat-running in the morning peak hour from the A31 through Blackwell Farm to Egerton Road. Drivers passing through Guildford northbound might try to miss the existing substantial queues on the A3 by leaving the A31 just before its junction with the A3 and taking the new link road which allowed them to join the A3 at the Tesco roundabout. Other drivers eastbound on the A31 aiming for Guildford could try to avoid the existing substantial queues both on the A31 and on the A3, as the new road would give them a new means of entry into Guildford from the west. The pressure for rat-running could be considerable if the link was built. Figure 4.7 in the SHAR shows that even after the A3 has been widened there will still be overcapacity and congestion on the A31 close to the A3 junction (and on the A3 through Guildford): this is likely to encourage significant numbers of drivers to dodge the queues on these roads through the Blackwell Farm development. The issue is reviewed in paragraphs 30-35 below, which show that the constraint on rat-running is most unlikely to be effective.
8. In the 12 months since the 2016 Proposed Submission Consultation by the Borough Council (working with Surrey County Council as Highways Authority and Highways England responsible for the A3), the prospect of adequate network road access to Blackwell Farm has not only made no progress but deteriorated. There are some indications of this in the alterations in the June 2017 Proposed Submission:

- the proposed link with the A31 has been downgraded from its ‘primary’ status and by default the link with Guildford is now presented as of equal significance (Policy A26 Infrastructure Requirements item 1); there are various reasons for this, explored below, but fundamentally the Council has been unable to find a way of making the link with the A31 work as it wanted;
- a major new secondary school with six form entry must now be provided on the Blackwell Farm site, which was previously sited elsewhere (Policy A26 Allocation item 9): a school of this size (circa 900 students comprising 180 students in each year group for five school years) would generate a very substantial amount of additional traffic, bringing in about 600 students daily from outside Blackwell Farm, much of it attracted from Guildford, but there have been no changes at all to the proposed capacity of the road network to accommodate this, which can only mean still worse congestion on Egerton Road and the surrounding network than inevitable anyway;
- proposals in principle are now included for limiting the road users on the new route linking to the A31 (Policy A26 Infrastructure Requirements item 3), but these are deliberately left vague as the Council has been unable to find a way of achieving this despite trying to do so for the last year;
- the developer of Blackwell Farm (ultimately University of Surrey) must contribute to funding improvements to the local road network necessitated by the scheme, but this must now have “regard to the Sustainable Movement Corridor Supplementary Planning Document”: as this SPD has not yet been published even in draft, the policy change demonstrates a remarkable lack of clarity about the role of the SMC in relation to Blackwell Farm (where it will go, how it will be built, who pays for it and how it links into the wider network) and creates an open-ended commitment which could affect the viability and deliverability of Blackwell Farm;
- the new Policy A59 has given a clearer specification of the need for a new railway station at Park Barn near the northern end of Blackwell Farm, with access from both the north and south sides: the access from the south will generate additional traffic affecting the roads to Blackwell Farm, especially in peak periods, which has been neglected in the calculation of traffic generation and the modelling of its distribution to the road network, again placing additional stress on already massively overloaded roads in peak periods.

These changes are additional to the increased traffic on Egerton Road and the surrounding network arising in any event from development planned or under construction at Manor Park and at the existing Research Park.

Traffic on the A3

9. Guildford Borough Council has adopted conflicting positions regarding its intentions for traffic on the A3 through Guildford.

10. The Council has endorsed a study commissioned in 2014 from Arup Guildford Town and Approaches Movement Study, a vision statement on transport in Guildford to 2050. This is the basis for the Sustainable Movement Corridor now promoted through the Local Plan by the Council (see paragraphs 51-53 below). However, the Arup study was clear that the purpose of the A3 should be to concentrate through-Guildford movements on this road, assisted by inhibiting its use for local movements. The study recommended:

“Interventions in this strategy that reduce roadspace in the town centre should serve to deter through traffic in the town; they should also reduce short journeys on the A3 within the town (for example, trips from the Surrey Research Park to the town centre via the A3) that will free up capacity for longer distance trips on the A3 trunk road”.

11. The Arup study was clear that there should be no capacity increase on the A3 trunk road through the town:

“In the appraisal of interventions undertaken for this study, all potential interventions that increased road capacity, including A3 interventions (widening, northern bypass, tunnel) and additional road links in the town centre, resulted in increased traffic levels in the long term over and above business-as-usual changes (i.e. in 2031 compared to the 2031 Business-As-Usual). Vehicle mileage increased by up to 2% across the borough and highway delay increased
by up to 16%, with associated deterioration in air quality, noise impacts, land use impacts and severance. These interventions are therefore not included in the strategy as they do not strongly support the multi-faceted headline vision for sustainable mobility in the town of Guildford identified to guide the development of the strategy.”

12. However, this study is increasingly being compromised. Arup’s limitation on using the A3 is wholly at odds with the approach which Guildford BC is taking in practice. The Council has decided that the Blackwell Farm development cannot proceed without substantially increased capacity on the A3. The last sentence of the 2017 Local Plan’s ‘Spatial Vision’ states: “The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford”. This is due to existing major peak hour congestion on the A3 (Local Plan paragraph 2.14a). The June 2016 Strategic Highway Assessment Report concluded that “the results of this assessment indicate that should the [DfT’s] Road Investment Strategy schemes [which include major A3 capacity increases through Guildford] not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe…. To avoid this occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended” (page 63, emphasis added). This was confirmed in the 2017 Addendum for the revised Proposed Submission Local Plan (Conclusion, page 2).

13. The Local Plan therefore aspires to a very substantial increase in the capacity of the A3, not least to facilitate car-borne travel to and from the major developments planned at Blackwell Farm (and Gosden Hill Farm). The Spatial Vision states:

“The Department for Transport’s Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange. Early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period.”

Paragraph 4.6.14 specifically explains the intention of Policy ID2 ‘Supporting the DfT’s “Road Investment Strategy”’ as including the identified:

“Scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25):
• A3 Guildford – improving the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements.”

14. In the last twelve months, the likelihood of any of this happening has been slipping away. The Local Plan has now been altered with the deletion from paragraph 4.6.18 of the option of a tunnel under Guildford, so that a road widening scheme is now the most likely option (even if a tunnel remains the Borough Council’s preferred option – see Topic Paper: Transport paragraph 5.101). Exactly what is intended is still hugely unclear: the Infrastructure Schedule for this project in Appendix 3 shows that what is proposed is so vague that it may cost anything between £100m and £250m (project SRN5). Only a brief examination of the A3 through Guildford will in any event show just how difficult, costly and enormously environmentally damaging would be any attempt to add significant extra capacity in each direction to the A3.

15. Also deleted is paragraph 4.6.17 which had stated “Guildford Borough Council and Highways England are in the process of agreeing a Statement of Common Ground which sets out assumptions regarding both the performance and safety outcomes that the RIS schemes can be expected to realise”. This is said to be because an SoCG is likely to be agreed closer to the Examination (Topic Paper: Transport paragraph 5.14), but we would not be surprised if Highways England is unable to make the commitment the Borough Council seeks.

16. Highways England itself is doubtful about how much can be achieved on the A3 and by when. Its response to the Proposed Submission LP on 18 July 2016 stated: “There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period.” A Technical Note supporting that submission, prepared by Mouchel, was more precise:

“It should be noted that the A3 RIS 2 scheme is not a committed scheme and no funding has been allocated at present. The details of the RIS 2 A3 Guildford scheme itself are not yet known and so the modelling and testing of an A3 scheme at this stage is considered premature. As such Highways England's view is that this scheme cannot be relied upon by Local Plans to form mitigation for the development proposals.”
17. So far as we are aware, this remains the position in July 2017. The response subsequently advised that the inadequate evidence base meant that the Plan was considered unsound.

18. Guildford BC found this response hugely inconvenient and persuaded Highways England to withdraw this statement after a meeting on 1 September 2016. Highways England’s letter on 5 October 2016 doing this stated instead (with our emphasis added):

“You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. The scheme proposes widening the existing carriageway to provide additional capacity and safety improvements between the A31 Farnham Road and the A3/A320 Stoke Road. The design of such a scheme is complex and needs to consider a number of potential options, a process which takes time to complete. We will continue close working with Guildford Borough Council and Surrey County Council to progress the development of the potential scheme.

We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. Therefore we wish to formally withdraw our representation to this policy.”

19. While Highways England is urging caution, Guildford’s Local Plan continues to make highly questionable assumptions. On timing, Appendix C claims that the A3 capacity increase will be ‘delivered’ between 2023 and 2027. This conflicts with paragraph 4.6.14 of the Plan (above) which expects construction to begin three years earlier. Delivery in 2023-27 is itself barely consistent with the Council’s own Topic Paper: Transport at paragraph 5.88, which reports that “Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start[ed] until 2024 at the earliest, with construction taking 2½ years.” This would mean that the capacity would only become available in 2027 at the earliest, in effect postponing by some years the Plan’s aspiration for A3 widening.

20. On funding, there is no clarity where the money for A3 widening would come from, even if it did surprisingly pass the value-for-money test. The proposed submission Local Plan has been amended from one year ago in the Infrastructure Schedule in Appendix C to give the impression that developers are now expected to foot more of the bill, further adversely affecting the viability and deliverability of Blackwell Farm. The change states the funding source will be ‘Highways England and developer funded’ instead of ‘Highways England and developer contributions’.

21. Finally, the exorbitantly expensive, damaging and disruptive widening of the A3 cannot be expected to achieve its objective of alleviating traffic flows sufficiently to accommodate effectively traffic from Blackwell Farm. Congestion will, remarkably, be worse with the A3 widened than without it. The SHAR reports in paragraphs 4.8.4-6:

“4.8.4 Table 4.1b shows in the PM peak that while the network performs better in Scenario 5 [i.e. with the A3 widening in place] compared with Scenario 3, it is still worse than in Scenario 1 with vehicle hours higher and vehicle speeds lower by 12% and 2% respectively.

4.8.5 As noted above in Section 4.5, the capacity increases on the M25 and A3 result in some high flow increases as trips re-route to make use of the improvements. In turn, this affects roads approaching the A3, such as the A320, A31, A25 and B3000. These also see high flow increases with some, such as the A320, experiencing a significant deterioration in the Level of Service.

4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.”

22. The Borough Council’s own evidence in both the SHAR and Arup report is that widening the A3 will increase congestion in the town rather than relieve it, with associated deterioration in air quality, noise impacts, land use impacts and severance. Blackwell Farm would damage the whole of Guildford. The likelihood of the A3 capacity being increased is less now than it was one year ago. So far as we can see, the ‘do nothing’ option for the A3 remains squarely on the table and is an increasingly likely outcome.
23. In summary, the evidence on the A3 consolidated during the last year shows that it is currently simply not known:

- if a suitable widening scheme can be designed and if so how much it would cost;
- whether the scheme would meet ‘value for money’ tests;
- whether the money for it could be found;
- whether the A3 capacity could be increased in time to assist the development of Blackwell Farm during the Plan period, as the earliest provision date would be 2027 (and probably later).

Finally, even if built, the widening of the A3 would generate congestion in Guildford rather than relieve it and would itself be even more over-capacity than it is now. The Borough Council’s reliance on the A3 capacity improvement is foolhardy in the extreme. Not proceeding with the Blackwell Farm development would be a far superior option.

24. The Council recognises that the Blackwell Farm development cannot proceed until the A3 has been widened, but realises that this cannot be achieved until, at best, near the end of the Plan period. As a result of the lack of progress in agreeing A3 capacity increases, the rate of provision of houses in Policy S2, which was back-end loaded in the 2016 Proposed Submission, is now in the 2017 Proposed Submission still more heavily skewed towards the end of the plan period. The 2019-20 provision has been dropped from 500 to 450, while the annual provision in the last three years of the Plan has been raised from 790 to 850. There is insufficient evidence to show that 850 dwellings per annum could be constructed and sold in the Borough in those last three years: the numbers reflect not how the housing market works, but the contortions which the Council has gone through to square its housing provision numbers with the aspirational timetable for the widening of the A3. A far superior option in both housing and transport terms would be to abandon both the Blackwell Farm development and the A3 widening (which in part is justified by Blackwell Farm as well as facilitating it).

[Text continued in next comment]

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

Attached documents: 226389 - Sketch drawing ‘Initial Junction Arrangement’ provided by University of ..., pdf (210 KB)

2017-06-28 TN02.pdf (254 KB)

Comment ID: pslp172/3436  Respondent: 8557985 / Artington Parish Council (Philip Gorton)  Agent: Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

[Text continuing from previous comment]

Access from the A31 Hogs Back

Junction with the A31

25. The principle of a new signalised junction on the A31 to facilitate access to Blackwell Farm is project LRN3 in the Infrastructure Schedule. The Plan accompanying Policy A26 Blackwell Farm is unchanged from June 2016. It continues to show a road access at a widened junction of Down Place with the A31, passing over the A31 slip road onto the A3 northbound. Our response to the June 2016 Consultation demonstrated, in a commissioned report from transport specialists, that the proposed signalised junction at Down Place with the A31 would be most unlikely to function effectively. Furthermore, Surrey County Council’s Strategic Highway Assessment Report June 2016 shows that the new junction would cause all users on average a 35 second delay compared with no junction (Table 4.11). In the last twelve months the Borough Council has been forced by a Freedom of Information request to release a sketch map provided by
the University of Surrey showing the latest proposals for this access. This involves a junction slightly west of the site originally intended but shows no distance measurements. It shows too an extra westbound lane for traffic on the A3 over-bridge but no bridge widening. Further proposals exist for this junction but have been denied to Save Hogs Back on weak excuses. Also, there appears to be no proposal to co-ordinate this junction with improvements to the Down Lane junction on the opposite side of the A31 slightly to the east, even though the creation of the Down Place access could ordinarily be expected to generate significant additional use of Down Lane.

26. The lack of transparency by the Council is significant: unless demonstrated otherwise, we consider that the proposed access at Down Place is likely to remain impractical for the following reasons.

- There does not appear to be sufficient road width for the proposed junction.
- A signalled junction is likely to be over-capacity at peak periods.
- Travellers leaving Blackwell Farm this way in the morning peak will suffer major tailbacks due to the overloaded A31 eastbound inhibiting left turns (the peak flow direction).
- Widening of the A3 over-bridge may well still be necessary at vast cost.
- Only a very environmentally damaging roundabout in the AONB on the top of the Hog’s Back (previously opposed by Borough Councillors) could be sure of accommodating likely flows.

**Access road between the A31 and Blackwell Farm**

27. Project LRN4 in the Infrastructure Schedule is an access road at Blackwell Farm with a through link to Egerton Road. The Plan continues to give the misleading impression that “The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV” (Infrastructure Requirements item 2). A significant road connecting to the A31 could not possibly be achieved by an ‘improved Down Place access road’, the route of which is narrow, lined by mature trees on both sides, and includes a significant sharp bend, while any alternative could not possibly be sympathetic to the AONB and AGLV. The construction of an access road through an AONB to a new urban extension would be major development in its own right. This could only be justified in AONB policy terms if there were exceptional circumstances. There are none of these and none are claimed or demonstrated.

28. The principal difficulty which has arisen in the last year regarding the new link road is that the Council has been unable to find a workable solution for the local road network. The Council wants residents of Blackwell Farm and employees at the Research Park and its proposed extension to be able to enter and leave either in the Guildford direction or the A31 direction, but it does not want most other drivers to use the same roads if they don’t really need to be there. There appear to be two intentions: to constrain drivers who are just passing through – so as to avoid rat-running (especially necessary if a direct through route can be found south of Manor Copse) – and to avoid attracting drivers who currently use Egerton Road. In both cases the intention is to avoid causing adverse network effects if drivers divert onto the new link, e.g. rat-runners overloading Egerton Road still further, or the new access prompting more traffic on the A31.

29. Policy A26 in the June 2017 Proposed Submission Local Plan sets out its solution: to provide a new route “between the A31 Farnham Road and Egerton Road” for “employees and emergency vehicles” (only) to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital. We address in this section the practicability of selecting users for the public highway. However, the matter is also linked to the separate issue of how to link Blackwell Farm into Egerton Road, the main road into Guildford (see paragraphs 47-50).

30. We have tried for the last year to obtain from Guildford BC and the County Highways Authority an understanding of exactly how users of the proposed new road network would be restricted to those people deemed suitable, with everyone else barred. No credible explanation has been provided. The matter is completely ignored in the Borough Council’s Topic Paper: Transport (June 2017) and Strategic Highway Assessment Report Addendum (June 2017), and is restated but not explained in Guildford Borough Transport Strategy 2017 (June 2017). This is an issue which cannot be brushed under the carpet because it lies at the heart of the credibility of the link to the A31.

31. The local authorities have been thinking about the issues raised but failed to find an answer after another year of investigating. Surrey County Council has indicated that its preferred option is the use of Automatic Number Plate Recognition (ANPR) coupled with a permit system. However, there is a general right of public access on the public
highway without the State snooping on who uses it by means of cameras, so the legality and practicality of any control system remains to be resolved. For this method to function, therefore, we anticipate that cameras would have to monitor passage on private roads, raising the prospect that Blackwell Farm might not be fully accessible on the public road network. It remains unclear what would happen to drivers whose number plates were not ‘authorised’ to use the road, or how they could be discouraged from arriving in the first place. If there was a system of fines for unauthorised use of the road link, this would require the co-operation of public authorities in perpetuity (which would need to have ongoing funding from the development). With private roads, control of the network would be lost to a private interest whose priorities might not always be the same as those of a public authority. Rights of access to the private roads could at any time be changed by the landowner by reference to which vehicles were allowed passage, when, at what cost, or in other ways. We would expect an urban extension to Guildford reliant on access and egress by private roads to be fundamentally unacceptable.

32. It is unclear whether Guildford BC appreciates the impracticability of the proposed differentiation between acceptable and banned users of the road. There will be thousands of ‘legitimate’ drivers resident in the Blackwell Farm housing development. There will be many hundreds of employees in the Research Park and its proposed extension. There will be hundreds of staff on the Manor Park campus and at the Hospital. Identifying these individuals and, specifically, the cars they will be driving would be a nightmare, made worse by staff turnover and churn in the occupancy of the housing development. Legitimate individuals may have good cause to use alternative cars. The newly introduced secondary school would be largely (two thirds) for the benefit of non-residents of the Blackwell Farm development, so large numbers of drivers can be expected to arrive from elsewhere using the link road, and would need to be registered. Many others will claim legitimate cause for registration on the ANPR system, such as staff at the Nuffield Hospital as well as the County Hospital, employees of shops and services in the area, taxi drivers and so on. The system of registration would become very large and unwieldy, requiring continual (and rapid) update, at real cost. A reliable and effective appeal system would be needed, but the frustrations of both registered and especially non-registered users of the road are still entirely foreseeable.

33. As the transport consultant to Compton and Worplesdon Parish Councils notes, the inevitable complexity of an ANPR process raises a series of questions related to site deliverability such as:

1. Will the developer provide for the financial enforcement costs of the link road restrictions in perpetuity? Is this included within the £20million cost for LRN4?
2. Will Surrey Police provide the enforcement of the ANPR in perpetuity?
3. How will all of the people who will be granted access to use the road be differentiated from through traffic?

34. Answers to these questions and resolving other practical concerns are fundamental to the successful deliverability of the vehicular link road and the urban extension as a whole. The road must not attract unwanted road users, but must still achieve the aim of serving all of the desired users. So far the Council has offered no commentary at all on how these awkward issues might be resolved, or on how the use of private roadspace to achieve a public purpose can be made to function without unacceptable risks of unilateral action by the landowner.

35. The outcome seems to us clearly inevitable if a link road is built. It will not be workable. Instead of a costly system of registration, fines, appeals, etc., the greater likelihood is that the foreseeable cacophony of opposition to a system which appears indiscriminate, unfair and ineffective will cause the system of ANPR and registration to be abandoned in a short order of time. All the disadvantages of the link road to the wider network would then be realised.

Impact of the link road on air quality in Compton

36. New information on air quality has become available since the consultation on the Proposed Submission Local Plan in 2016. In particular, Guildford Borough Council has issued an admirably brief and clear 2016 Air Quality Annual Status Report, September 2016. This shows that a specific area of the B3000 road through the village of Compton (in whose parish Blackwell Farm partially lies) has one air quality monitoring position which consistently reveals concentrations of Nitrogen Dioxide (NO2) well in excess of the legal limit adjacent to a dwelling (and the highest figure in the Borough). This is the only location in the Borough where this combination arises. (There were two other places with lesser exceedance of the legal limit, but one was located well away from dwellings and the other was unreliable having only 33% data capture rather than the 75% required.) Other monitoring positions nearby in Compton had NO2 pollution approaching the legal limit.
37. There is no doubt whatever about the cause of the pollution problem: through traffic passing through the village. Large numbers of cars pass through and lorries on the relatively narrow road can cause additional congestion. Further monitoring and modelling is taking place to ascertain whether any further action is required, notably using Advanced Dispersion Modelling Software (since June 2016). The Guildford Borough Transport Strategy 2017 reports that in respect of Compton “The Council is considering whether to declare an Air Quality Management Area and, working with Surrey County Council, will use the results of an ongoing study looking at the pattern of daily exposure to design and implement appropriate mitigating measures” (page 19). The Council has proposed no means of achieving in the short term a permanent reduction in traffic volumes through Compton. On the face of it, an AQMA may well therefore already be needed: under its legal duties the Council must designate one if it is unlikely that the objective values (i.e. less than 40g/m³) will be met in a given timescale, and the Council must then prepare an Air Quality Action Plan (AQAP) with the aim of achieving value objectives.

38. The vehicle count through Compton will rise alarmingly if the Blackwell Farm development and the associated A3 widening are built, inevitably necessitating an AQMA and with little or no prospect of an AQAP being effective. For vehicle impacts, the SHAR treats development of Blackwell Farm and accesses to it as a two-stage process: ‘Scenario 3’ involves the construction of key highway schemes providing access to large development sites (incl. Blackwell Farm) and local highway schemes, while ‘Scenario 5’ involves the widening of the A3 at Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction). The traffic consequences of each are modelled separately. In practice, as established in paragraph 12 above, there is common ground between the Borough Council, County Council and Highways England that the Blackwell Farm development cannot proceed until the A3 has been widened, so in practice the highways impacts of the site access road and A3 widening are additional if Blackwell Farm is to proceed.

39. The SHAR shows in Figure 4.3 for the morning peak hour that 275 vehicles will leave the A31 at Down Place (for Blackwell Farm, the Surrey Research Park and County Hospital). Paragraph 4.7.5 suggests that these are trips which primarily have their origin in the west, (though the likelihood is that many of them will have actually their origin in the south: traffic from Godalming and Farncombe, for example, could access the A31 at the Puttenham junction and then head for the Research Park or Hospital while avoiding Guildford.) In short, a proportion of the 275 vehicles using the Down Place junction under Scenario 3 will have passed through Compton. Unfortunately, the network effects diagram shown in Figure 4.3 does not extend southwards to Compton to identify an indicative number.

40. The SHAR then indicates the impact of Scenario 5 compared with Scenario 3. This is reported for Compton in Table 4.5, showing that the B3000 through Compton will have one of the highest absolute increases in flow arising from the widening of the A3, with an additional 145 vehicles per hour in the morning peak, representing a further 16% increase in traffic through Compton. The Table notes that both under Scenario 3 (even without the A3 widening) and under Scenario 5 the Level Of Service on the road would be category E: ‘Unstable flow operating at capacity’. The outcome could be even worse: the SHAR notes at paragraph 4.7.5 that potentially the number of drivers attracted to use the new Down Place to Blackwell Farm link could be somewhat higher as the model cannot accurately reflect the queuing that occurs on the nearside lane of the A31 as it approaches the merge with the A3. If so, the numbers passing through Compton could be expected to increase proportionately.

41. The evidence is clear that the combined effect of the Local Plan’s proposals for the Down Place link road to Blackwell Farm and the A3 will greatly increase traffic through Compton which in turn will have an inevitable and appalling impact on air quality (which already exceeds legal limits at one location). Despite this, the Council is in denial about the air quality impacts of its Proposed Submission Local Plan 2017. Aecom have prepared for the Borough Council an Air Quality Review of Guildford Borough proposed Submission Local Plan: Strategy and Sites “June 2017”, but this completely fails to appreciate the relationship between the Blackwell Farm development, the proposed road infrastructure developments and air quality at Compton. It provides a series of unwise statements:

(i) “it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective in to the future, without additional measures being required locally” (section 2.3). The reference to little development in the area is absurd: a major urban extension is proposed in the Parish. The suggestion that technological advances in emissions will solve the problem is fanciful in anything other than the long term, whereas there is an immediate need for action to reduce vehicle passage through Compton.
(ii) “The assessment identified a risk of exceedance if traffic flows, primarily on the B3000, increased. The area was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO2 concentrations measured in the area” (section 4.1). This finding is simply wrong: Table 4.5 of the SHAR anticipates a 16% increase in traffic in Compton from the A3 widening, not counting any increase generated along the Down Place link road.

(iii) A review of Policy A26 Blackwell Farm (section 5.2.2.1) recognises that “A large development such as this is likely to have an impact on local air quality as there are likely to be large changes to traffic flows on nearby roads and thus impacts on pollutant concentrations”, but failed to realise the consequences for Compton, even though this is nearby and clearly the place with the worst NO2 pollution recording in the Borough (which should obviously be one of the first places to examine for air quality consequences).

(iv) A review of the air quality impact of the Local Plan on Compton (section 5.2.4) similarly fails to appreciate the evidence. This states in full: “There is one large land allocation within the parish of Compton, A26 Blackwell Farm, discussed above. The additional traffic flows predicted to be generated by this development are not predicted to have a significant adverse effect on air quality in the area of the village of Compton. There are no other large allocations local to Compton Village. As a result the implementation of the GBC Draft Local Plan should have little effect on future traffic flows through the area and thus negligible impact on local air quality.”

(v) Rather than address the air quality consequences of Blackwell Farm at the Local Plan stage, when decisions can still affect air quality in Compton, Aecom choose to defer any consideration of the issue until a time when little can be done about it. On four occasions in the Executive Summary the issue is recommended as a matter which can be dealt with ‘through the planning application process’. Once allocations of land are made for development, strategic reasons for resisting them (e.g. on air quality grounds) are typically overruled as matters which should have been resolved at the plan-making stage. Leaving air pollution consequences of proposed development until the planning application stage is an exercise in trying to sweep the issue under the carpet.

42. Aecom’s recommendations in section 5.4 recognise that “The increase in traffic flows associated with the implementation of the Draft Local Plan are predicted to be in the region of 12,500-17,000 vehicles per day on the Guildford Bypass [A3]”, but seem to assume – extraordinarily – that no extra vehicles will pass through Compton (despite the evidence in the SHAR). In our view, the Aecom report and its recommendations represent a significant failure to respond to clear evidence of the air quality damage that the Blackwell Farm development as a whole and the associated A3 widening would inflict upon Compton, about which little could then be done in the short term. We wholly disagree with its approach, which could threaten life-expectancy in Compton.

43. It is hardly surprising that air quality is barely mentioned in the Sustainability Appraisal and treated as a minor issue, as Aecom also prepared this for the Borough Council: paragraph 10.7.1 final indent merely recommends that ‘detailed modelling’ is undertaken close to where very large increases in traffic flows are expected. Paragraph 10.7.7 concludes “Proposed changes to the spatial strategy have little or no implications for health, whilst proposed changes to site specific policy (particularly regarding air quality; see discussion above), responding to the Air Quality Review (2017), are supportive of good health.” Again key decisions are to be left until too late until the planning application stage, with both the SA (at paragraph 10.7.1) and the Air Quality Review (at page 5) recommending that ‘potential air quality issues’ should be added to the list of ‘key considerations’ at the end of the main urban development allocation policies, including Policy A26 Blackwell Farm. This has been taken up by the Borough Council. However, the SA fails to address the key issue that needs resolution now: how to stop additional traffic being attracted through Compton or reduce it.

\section*{Connection to Guildford}

\textit{Linking the Research Park Extension to the road network}

44. The expansion of the Surrey Research Park and the creation of the Blackwell Farm estate are treated as part of the same development in Policy A26. In access terms it is more sensible to consider them separately. The Research Park proposal is for an Extension of 10-11ha, which would be to the north-west of the current Research Park. Access would be straight-forward from Guildford: via Egerton Road and Gill Avenue, via the roundabout serving the Research Park by the Occam Road/Priestley Road loop, and by making an extension to Stephenson Way. A road serving the Extension could be taken through the mature hedgerow separating the existing Research Park from Blackwell Farm at a point close to and
parallel to the railway line. Stephenson Way has been constructed to allow further extension of the roadway in this location (also giving access to some of the last remaining large vacant sites on the current Research Park). Proposals for the Sustainable Movement Corridor in the June 2016 ‘Progress update’ as part of the evidence base for the Proposed Submission Local Plan at that time were consistent with this. They showed in Figure 5 a schematic route for the SMC. This is reproduced on page 16 of the Guildford Borough Transport Strategy 2017. At its western end this turns north from Gill Avenue, apparently to follow Occam Road and Priestley Road, before making a westward thrust into the Research Park extension area (though whether north or south of Surrey Satellite Technology is difficult to say from the scale of the plan provided). So far as the Research Park Extension is concerned, that would seem to be an understandable direction in which to take the Sustainable Movement Corridor.

45. However, this arrangement would introduce development into Green Belt and the setting of the AONB at Blackwell Farm, breach the excellent existing screening of development from the west, add substantial additional traffic to the heavily congested Egerton Road, and in all likelihood be opposed by existing users of the Research Park who would be unlikely to want a significant thoroughfare in their midst. We therefore consider this proposal unacceptable. We note, too, that the proposed SMC may now stop short of the Research Park Extension (at the roundabout on Gill Avenue at the top of the hill), as indicated in the Sustainable Movement Corridor – Update 20 February 2017 in Figure 4. How or whether the SMC would link into Blackwell Farm or the Research Park Extension has become a mystery.

46. We do not accept that the sensibilities of existing staff in the current Research Park should dictate the most appropriate access route to a Research Park Extension. However, if the intention (and this is unstated in the Local Plan) is that the Research Park Extension could only proceed if a new road link was made to it from the A31, to avoid access only through the existing Research Park, there would be even less justification for the development going ahead. Not only would the scheme still intrude into Green Belt and the setting of the AONB at Blackwell Farm. It would also be partly responsible for requiring major development of a road in the AONB and so could only be justified in ‘exceptional circumstances’ (which it has neither claimed nor demonstrated). Given that the Extension would now be physically separate from the existing Research Park, it would be unable to claim Blackwell Farm as an essential location. So far as we can see, the Extension does not need to be in this location at all, and a more fundamental review of its future location would be in order. That would also help avoid traffic growth on Egerton Road.

**Linking Blackwell Farm to Egerton Road and the Tesco roundabout**

47. How the Borough Council and the County Highways Authority propose to link the Blackwell Farm development into Egerton Road preferably via Gill Avenue, in accordance with the Proposed Submission Local Plan 2017 Policy A26, remains unclear. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. One option has recently been lost by the construction of the substantial School of Veterinary Medicine on the line of one possible access road. We consider the Proposed Submission Local Plan to be derelict in its duty to demonstrate how such a major urban development on the edge of Guildford can in reality be linked into the fabric of the town. The Borough Council is plainly having great difficulty finding a suitable access route. We strongly recommend that the Local Plan should not be submitted for Examination unless this route can be clearly identified first.

**Impact of Blackwell Farm and the Research Park development on the local road network**

48. Egerton Road is one of the worst congestion hotspots in Guildford and the wider area. Egerton Road provides the main access to the Surrey Royal County Hospital and a superstore, and the only access to Surrey University’s Manor Park student village, Surrey Sports Park and the entirety of Surrey Research Park. The demand for access to all these destinations is growing, notably with building programmes at Manor Park and the Research Park. The high level of existing congestion will therefore get worse, even before Blackwell Farm is contemplated. Egerton Road is accessed principally from Guildford to the east but its capacity is fundamentally constrained by the pinch-point of the A3 underpass, which is a single-carriageway road capable of providing for two lanes of cars each way (but not wider vehicles). Overloading of the roundabouts at either end of the underpass, which both have links to the A3 and other destinations, also act as pinch-points for traffic from numerous sources and cause traffic to back up onto the roads into them (even onto the A3). The likely additional traffic generation at the Egerton Road/Gill Avenue crossroads, immediately west of the Tesco Roundabout, was noted in paragraph 6 above.
49. The concept of adding the major Blackwell Farm estate and a 10–11ha Research Park extension, both accessed from Egerton Road, without any significant vehicle capacity increase on Egerton Road itself, seems astonishing to the point of being hardly believable. The Strategic Highway Assessment Report June 2016 accompanying the Proposed Submission Local Plan a year ago states of the Blackwell Farm development: “in Scenario 2, without either new highway schemes or specific access arrangements, trips from Blackwell Farm load onto the A31. But with the access arrangements modelled together with an access road through the development to the Surrey Research Park, this assessment indicates that significant pressure could be placed on Gill Avenue, the Hospital junction and other parts of the network in that area” (paragraph 4.5.4). Paragraph 4.9.5 of the SHAR specifically identifies that “the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.”

50. In addition to this, in the last twelve months, the Proposed Submission Local Plan 2017 has upgraded the importance of Egerton Road to the purpose of providing access to Blackwell Farm, compared with the 2016 Plan, in that the alternative proposed access to Blackwell Farm via the A31 is no longer designated as the ‘primary’ access and Egerton Road is no longer designated the ‘secondary’ access. They now have equal status. Whereas this properly reflects the implausibility of an acceptable link to the A31, no change whatever has been proposed to Egerton Road to accommodate such extra traffic as may now be expected to take this route (which is unspecified). In our view, the additional traffic congestion impacts on an already overloaded local network are so foreseeably dire that we strongly recommend the Blackwell Farm development should not be taken forward.

Sustainable Movement Corridor

51. Back in 2014 Arup prepared a report *Guildford Town and Approaches Movement Study* for the Borough Council, a vision statement on transport in Guildford to 2050, which included a very broad indicative route at a scale that was difficult to apply on the ground. This has been endorsed by the Council. The purpose was to facilitate sustainable movement, strongly emphasising public transport, walking, cycling and demand management at the expense of travel by private car. The centrepiece of the scheme was a corridor segregated to be available to fast buses (and possibly trams), cyclists and pedestrians, linking the key existing areas of the town that are drivers of growth. There would be new bridges over the railway (in the town centre) and over the River Wey (across the floodplain near Stoke Lock). The estimated total cost was broadly £75-100 million though clearly not costed in detail. Cars would be banned from the Corridor which, because it would be based on using existing roads, some of them major roads, would represent a highly significant congestion impact on an already overloaded local network. There would be new bridges over the railway (in the town centre) and over the River Wey (across the floodplain near Stoke Lock). The estimated total cost was broadly £75-100 million though clearly not costed in detail. Cars would be banned from the Corridor which, because it would be based on using existing roads, some of them major roads, would represent a highly significant congestion impact on an already overloaded local network.

52. The 2016 Consultation proposed a Sustainable Movement Corridor, included in the Plan at the last moment (Spatial Vision, Policy I3 and paragraph 4.6.24). Various land allocation policies required co-ordination with the Corridor. Paragraph 4.6.24 explained that the Sustainable Movement Corridor would link major developments to Park-and-Rides, including Blackwell Farm (at its western end), and stated that the Corridor would be ‘largely on existing roads’. ‘Route sections’ were listed in the Infrastructure Schedule (Appendix C) with six itemised segments with some broad cost figures suggested (£80-90m in total). No route for the Corridor was included in the Plan, but instead the evidence base included a Progress Update on the Sustainable Movement Corridor scheme (GBC, June 2016). This showed a revised figurative route and possible road layouts at some key junctions and sections. It showed variations from the Arup study, notably with: a spur to Slyfield based on the existing A320 rather than a river crossing further east and also a lengthy new corridor up the A3100 to Gosden Hill Farm. The Arup Corridor would be downgraded in many lengths to shared roadspace with existing traffic (i.e. normal roads) but with bus priority measures. A land bridge over the A3 to provide a connection to the Research Park was downgraded to using the existing Egerton Road underpass: the recommendation was “to consider further the potential for tidal bus lane on Egerton Road as it passes under the A3 trunk road, with signalised control at either end controlling its use by buses, whilst retaining two working lanes of general traffic. It would be anticipated that the tidal bus lane would be used westbound in the morning peak period and eastbound in the evening peak period.” Changes to the Tesco roundabout would also be needed. Development would begin in the town centre and be phased later for other sections (to 2033).
53. The 2017 Consultation has made little progress on the Sustainable Movement Corridor. Policy ID3 now mentions a Supplementary Planning Document on the topic, but there is no sign of this even in first draft despite the passage of another year. This is an unacceptably inadequate basis upon which to plan for major urban development at Blackwell Farm. However, a further report Sustainable Movement Corridor – Update published in February 2017 does for the first time include a published small-scale street map on which the Sustainable Movement Corridor (SMC) is superimposed and clearer proposals for an initial western section. However, the Council clearly have insufficient confidence in this to include it in the Local Plan. The 2017 Update shows changes from the 2016 Update, notably with an additional crossing of the railway beside Yorkie’s Bridge and an additional north-south corridor along Woodbridge Road and Onslow Street between the A25 and the gyratory.

54. The Sustainable Movement Corridor will measure its effectiveness by a substantial degree of modal shift away from cars and towards sustainable transport modes. The starting point for analysis is that the Strategic Highway Assessment Report 2016 assumes no modal shift to sustainable modes, and so is a ‘worst case’ in respect of cars (paragraph 4.1.8). Paragraph 4.6.28 of the Proposed Submission Local Plan 2017 now states that “the site allocations and proposals in this Plan – including the significant programme of schemes to provide and improve opportunities to use active modes, bus and rail – are intended to result in a modest modal shift over the period to 2034”. However, the Council has accepted that this is unlikely to be enormously effective: the same sentence continues “we forecast that there will also be an absolute increase in overall traffic volumes.” Instead the paragraph proposes to ‘increase highway capacity’. This is a downgrading from the intentions just a year ago, when paragraph 4.1.8 of the SHAR stated “The impact of these sustainable transport schemes is expected to be significant”. What, therefore, is the Council’s objective?

55. The key section of the SMC for Blackwell Farm is the western section. At the key pinch-point of the A3 underpass, the Sustainable Movement Corridor can only function if the existing four lanes for vehicles are reduced to three, with one of these lanes taken up as a bus lane based on tidal flow routing. Space for other vehicles would be halved. The Proposed Submission Local Plan 2017 together with the main transport documents supporting it (the Guildford Borough Transport Strategy 2017 and Topic Paper: Transport, June 2017) are silent on whether this will be implemented, but as it is a key feature of the SMC, which could not function without it, we assume that this is what is proposed. Furthermore, the Tesco roundabout diagram in the 2017 Update document shows no roadspace at all reallocated to the Corridor west of this point.

56. The Council does not appear to have modelled the network consequences of creating the western section of the SMC (or any other section). With the Blackwell Farm development completed, the SHAR forecasts (Figure 4.3) that, in the morning peak hour, there would be 837 movements westbound and 636 movements eastbound along Egerton Road through the underpass (one vehicle about every 4 seconds and 6 seconds respectively). The underpass is highly unlikely to have the capacity to accept this level of traffic on a single lane each way. That would still be the case after modest modal shift had reduced the vehicle counts somewhat. It seems to us unrealistic to believe that all traffic inhibited by denial of road space will divert to sustainable modes. The more likely effect is that the SMC will simply add greatly to the predicted overcapacity on Egerton Road, with knock-on effects through the network. The principal effect of the SMC in the Blackwell Farm area is therefore likely to be to make traffic congestion worse rather than better if the development is built.

57. The footpath and cycleway on the north side of Egerton Road, segregated from traffic but not from each other, would be maintained under the proposals in the 2017 Sustainable Movement Corridor – Update, though the current design is cramped and mostly unattractive. The footpath and cycleway cease east of the Tesco roundabout, so walkers and cyclists have to fend for themselves when crossing the Ashenden Road arm of the Tesco roundabout. No improvement even to this basic problem is proposed in the Plan. The Plan needs to be clearer about what if anything it is actually proposing in order to encourage walking and cycling to and from the Blackwell Farm development.

58. If the modal shift fails to happen, the level of congestion in Guildford will become significantly worse. Modal shift is the only means by which the Council can find any practical means of moving additional people at scale into and out of Blackwell Farm (and the associated 10-11ha expansion of the Research Park). Even so, given the existing very high levels of congestion and over-capacity on Egerton Road and Gill Avenue, especially in peak periods, there is no certainty that there will be sufficient roadspace for vehicles, people and goods to reach the Blackwell Farm development even after the Sustainable Movement Corridor has taken a proportion of travellers (itself taking up roadspace).
59. The Council has not demonstrated a credible strategy for actually achieving modal shift in practice, notably by removing both roadspace for cars and destination car parking spaces. Modal shift is not mentioned in Policy A26, despite its imperative importance to the delivery of Blackwell Farm. The strong impression given by the Plan is that the SMC has been greatly downgraded from the original proposals by Arup to which the Council subscribed, and is therefore unlikely to deliver the modal shift which is essential for the development proposals in the Plan to be feasible. It seems to us that the likelihood is that the Sustainable Movement Corridor in the Blackwell Farm area will be massively inadequate. As the Council’s heart does not appear to be in modal shift, we consider that the Blackwell Farm proposal will be undeliverable and we recommend that the proposed allocation in Policy A26 is withdrawn.

60. The purpose of the SMC can only be achieved by upsetting car drivers. However, the Plan strongly emphasises accommodating traffic generation from proposed development with figures apparently incorporating: no modal shift at all; a sustained aspiration for a major increase in capacity on the A3; and continued investment in local road capacity improvements. We conclude that the Sustainable Movement Corridor has already been compromised, will fail to make discernible impacts on existing congestion, and will therefore not have anything like enough impact on travel patterns to accommodate the people and goods movements arising from 1,800 houses at Blackwell Farm. We recommend that the Local Plan should not be submitted for Examination without deletion of the Blackwell Farm proposal in Policy A26.

Funding the transport infrastructure necessary for Blackwell Farm

61. We pointed out in our submission a year ago that the scale of financial support expected from the developers of the Blackwell Farm site for the delivery of road infrastructure alone was far above the amounts normally expected. In the last year the obligations upon them have increased. The Proposed Submission Local Plan has now been amended in the Infrastructure Schedule in Appendix C. Proposals affecting the A3 were noted in paragraph 20 above, to which Blackwell Farm developers will be a party. Other new financial commitments specific to Blackwell Farm are:

- Project BT6 ‘Significant bus network serving the Blackwell Farm site and key destinations including the existing western suburbs of Guildford and the town centre to be provided’ is a new requirement in 2017, which must be entirely funded and delivered by the developer, at a price which is still to be confirmed, and therefore an open-ended commitment at present;
- Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’, which must be entirely funded by the developer, has seen its cost increase from £5m to £10m;
- The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN3 ‘New signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)’, which is likely to increase financial obligations on the developer;
- The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN4 ‘Access road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)’, which is likely to increase financial obligations on the developer;
- The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’, which is likely to increase financial obligations on the developer;
- A “Necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station” towards the estimated £10m cost of Project NR2 will still be required from the Blackwell Farm developer (the only named developer required to contribute) in accordance with Policy A26 Infrastructure Requirement (7): this assumes greater importance now that the station merits its own Policy A59 (see paragraphs 63-64 below);
- The funding arrangements for SMC1 Sustainable Movement Corridor: West have been amended slightly. The change states the funding source will be ‘Developer funded and Local Growth Fund’ instead of ‘Developer contributions and Local Growth Fund’, suggesting that the developers will have to fund somewhat more than previously expected. The Blackwell Farm development will be the principal contributor to this section of the SMC.

62. Transport consultants advising Compton and Worplesdon Parish Councils calculate that the transport infrastructure alone for the Blackwell Farm development will cost about £60million, most of it up-front. This is around £35,000 per dwelling. There will be other major costs which the developer will be required to fund, including new primary and secondary schools and affordable housing (none of which were included in our previous costings), all of which can be very expensive, and numerous other mitigation costs from such a major development. There is, therefore, a real risk that
the proposed development will not be viable and deliverable. If still included, the Local Plan would need to ensure that the Blackwell Farm development complies with paragraph 173 of the NPPF on this point. In reality, in the absence of other funding sources to provide money which the developers may be unable or unwilling to provide, the Blackwell Farm scheme would have to fail and be deleted from 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:** pslp172/3925  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Blackwell Farm, Hogs Back, Guildford – Notwithstanding and without prejudice to our previous comments in respect of this site, we broadly acknowledge the amendments made. We do not accept, however, the provisions for access to the A31, a signalised junction within the AONB and any enlargement to the existing lane, Down Place access road. The developers should bring forward ideas to improve the existing strategic local road network to accommodate the development, including working with Highways England and Surrey County Council to reconfigure both the Farnham Road slip road and Beechcroft Drive into an improved junction on the A3 – only an ‘Aspiration’ in the infrastructure schedule.

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

**Attached documents:**

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**Comment ID:** pslp172/5040  **Respondent:** 8564001 / Judith Cowan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

**Attached documents:**
I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new...
junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

Attached documents:  
- Independent Traffic report annex 3.pdf (2.5 MB)
- Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)

Comment ID: PSLPS16/8293  
Respondent: 8570273 / Fiona Curtis  
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 Blackwell Farm in this Local Plan, for the following reasons:

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to...
congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.

- Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in “Guildford urban area” and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

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

**Attached documents:**

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**Comment ID:** pslp172/4160  **Respondent:** 8570273 / Fiona Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1) 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]

2) 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

3) 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]

4) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

Policy A26: Blackwell Farm has been amended and now the proposed development includes a secondary school with up to six form entry. This will add to morning peak hour traffic which was not included in the 2016 modelling. The SHAR findings indicate that there will be congestion in peak periods on the network that will serve this development. The A3 will be at or over capacity which means that the network will lack resilience, as it does today. The roads connecting to the town centre will continue to be under pressure. The SMC concept is more advanced on this section than elsewhere, but the effect on capacity has yet to be established. There will be queuing on the A31 on the approach to the new signalised junction that will give access to the Blackwell Farm site. The A31 is regarded as a key route by the LEP and LA partners.

I fully endorse all the comments made by Richard Bate of Green Balance in the response he produced for Compton Parish Council and include this as annex 13.

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| Northdowns Housing Ltd | GBC has given considerable amounts of taxpayers money to a company called Northdowns Housing Ltd, where the Directors are Councillors or Ex councilors or are connected to GBC. The company is based at GBC yet when it was agreed that £22m of tax payers money be diverted to this company it was not to add to the housing number by building social housing, but to buy affordable housing to rent and to be profitable. This does not help those most in need and directly competes with first time buyers. Financial details of the company and salaries of directors were |

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**Object**
not published with the reports pack and whilst exceptions can be applied to information held with Companies House, this is not at this stage.

This direction is not one I feel comfortable with and I am not sure that all other GBC councilors are comfortable with it either.

I support building social housing but do not support this modus operandi and hope that the Local Plan can clearly identify the purpose of this company and how it plans to operate.

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

Attached documents:

Comment ID: pslp172/893  Respondent: 8573601 / Joanna Handley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/4293  Respondent: 8573793 / Harry Eve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Site A26 Blackwell Farm, Hogs Back, Guildford

162. I object to this site being included. It is Green Belt and there are no exceptional circumstances. It will put further pressure on the Thames Basin Heaths SPA and other remaining areas of high biodiversity such as Broadstreet Common.

163. The proposed development would ruin the setting of the AONB at this end of the Hog's Back and create major traffic problems.
164. The Strategic Highway Assessment Report indicates that the issue of traffic using the site as an alternative route to locations in Guildford, and to avoid congestion on the main road, has been recognised along with the serious problems it will generate in the vicinity of the hospital including increased use of the dangerous slip onto the A3 near the Tesco. I understand that possible solutions might be to use a discouraging winding route through the site or a number plate recognition system (ANPR).

165. A winding route will add to all legitimate users' journey times, carbon emissions and air pollution. Access and journey times for emergency vehicles will be impaired. Legitimate users include delivery vehicles that may want to continue on a route into and through the site for efficiency reasons.

166. An ANPR solution sounds like a bright idea that has not been thought through. It would be a "Big Brother" solution fraught with difficulties - legal and administrative. Consider visitors choosing to leave by the opposite route and delivery vehicles continuing through the site and out the other side. Keeping up with changes in residents' and other legitimate users' vehicles would be difficult and create problems. Who would profit from fines or bear the cost?

167. Additional traffic congestion in the vicinity of the Accident and Emergency access is highly undesirable for Guildford residents due to the increased time it will take to receive emergency treatment - it is a life-threatening issue.

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

Attached documents:

 Comment ID: PSLPS16/3731  Respondent: 8574369 / Douglas French  Agent: 
 Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
 Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposals for Blackwell Farm because they breach the Green Belt, the housing numbers are excessive, damage would be caused to the Surrey Hills AONB and excessive extra traffic would be inflicted on Send.

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

Attached documents:

 Comment ID: PSLPS16/2674  Respondent: 8575585 / Ian Macpherson  Agent: 
 Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
 Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A26: Blackwell Farm

I note and appreciate major representations from others as to Green belt and AONB. Interestingly, while there are major landscape considerations, the site is visible but not very visible from the A3 at that point, nor from a number of other likely viewpoints. It has been observed that the most significant external viewpoint is the upper wards of the RSCH.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
[Comment ID: pslp172/5133] **Respondent:** 8582465 / Mr John Empringham  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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- 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 for Nitrous Oxide.

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

**Attached documents:**

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[Comment ID: pslp172/652] **Respondent:** 8584929 / Keith Stainer  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

**Policy A26: Blackwell Farm, Hogs Back**

I have previously objected to the inclusion of this site in the local plan and now object to the addition of a secondary school (Allocation 9) on the grounds that there is already overprovision by in excess of 700 places at the secondary schools serving the western parishes and I fail to see why land should be taken out of green belt to add to this over provision.

I also object to the additional proposed access to the site via Egerton Road (Requirements 1). The existing infrastructure in the A3, Egerton Road and Gill Avenue area cannot cope with existing peak time traffic flows with delays and long queues frequently forming in all three roads, the queues off the east bound A3 carriageway are particularly worrying given the potential for accidents, similarly the access slip road to the A3 is wholly inadequate with those joining the east bound carriageway often having to risk life and limb to join the main carriageway from a very short slip road which severely limits the time available to check for a suitable gap in traffic. I also note that the access is stated to be "preferably via Gill Avenue". This statement lacks the precision required for an objective comment. If not Gill Avenue how else?
I object to this development. The number of houses has been reduced by 300 for this plan period, but the same amount of land has been allocated and further development is indicated. A sixth form secondary school is now proposed and this will increase peak hour traffic on already over-full roads. The addition of a school is a circular argument. Without the development the school would not be needed on Blackwell Farm and school places for the wider area could be provided within existing schools or on urban sites within Guildford.

An independent study shows that a part of Blackwell Farm site is equivalent in status to an Area of Outstanding Natural Beauty and may well be upgraded after Natural England’s boundary review has taken place.

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

Attached documents:

Blackwell Farm, Hogs Back – Mixed use 1,800 homes, 6 Traveller pitches, employment, Local Centre, school etc. OBJECT the majority of this land should be designated AONB

- Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary.
- The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board.
- the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands. The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the
following Ancient Woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

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

Attached documents:

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Comment ID: PSLPS16/3774  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Site Allocation Policies: I am in support of the development of Blackwell Farm (Site Allocation A26) being in the Local Plan but believe that it should be extended to provide for 3,000 homes.

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

Attached documents:

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Comment ID: pslp172/4905  Respondent: 8587585 / Mr & Mrs M Chattaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: PSLPS16/6906  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the proposals for Blackwell Farm because they breach the Green Belt, the housing numbers are excessive, damage would be caused to the Surrey Hills AONB and excessive extra traffic would be inflicted on Send.

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

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<td>Within BOA TBL01 Wanborough &amp; Normandy Woods &amp; Meadows; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows). There is Ancient woodland adjacent that is particularly vulnerable to ecological isolation (Strawberry Grove/Manor Copse/Dean Bottom). The Trust reserves further representation on the scale of development currently allocated here if these tensions cannot be satisfactorily reconciled.</td>
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<td>Surrey Wildlife Trust recognises the decelerated phasing of development here (from 1800 to 1500 dwellings over the life of the Local Plan). The Trust retains its reservation for further representation on the specific development management decisions at this site.</td>
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POLICY A26

1. I object to the inclusion of Blackwell Farm (A26) in the local plan. The site is within the Green Belt and all constraints have been ignored. The site is owned by Surrey University which has permission to build 2000+ units of accommodation on campus but has failed to do so. Building on Blackwell Farm would be detrimental to the Surrey Hills AONB and adjoining AGLV. Given existing congestion in the locality on the A31/A3 the additional 200+ homes would make congestion/commuting intolerable and impact on Air Quality. (I have objected elsewhere to the Wisley (A35) Development. Blackwell Farm and Wisley are similar in need of protection from any development).

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

Attached documents:

Comment ID: pslp172/756  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/5376  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Policy A26 – Blackwell Farm - Serious consideration needs to be given to the engineering solutions necessary to maintain the fragile balance of water in the area. If this is not addressed, it will have a damaging impact as far away as Whitmoor Common.

I draw the Council’s attention in particular to the very useful work by Worplesdon Parish Council which they will have submitted separately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy A26: Blackwell Farm.

Unmet housing need is not a reason for building on the Green Belt. Exceptionality has not been shown. (NPPF 87-89)

This site is currently farmed and an AGLV. NPPF states that good agricultural land should be retained for food production. In the light of the Brexit decision GBC should be even more slow to use this valuable farming land for development (NPPF 112)

Blackwell Farm is home to a wide variety of animal and plant species. Building here will harm Biodiversity. (NPPF 123 point 4 refers)

The Surrey Hills AONB will be damaged by a proposed new road. (NPPF 115)

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

Attached documents:

Comment ID: pslp172/5054  Respondent: 8596673 / Peta Malthouse  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/801  Respondent: 8597761 / Mrs Pippa Fleming  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to proposed development of 1,800 houses at Blackwell Farm.

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

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<th>Comment ID: pslp172/2460</th>
<th>Respondent: 8599201 / Richard D Jarvis</th>
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<th>Comment ID: pslp172/1072</th>
<th>Respondent: 8603841 / Shackleford Parish Council (Kate Lingard)</th>
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<td>I write to provide an objection from Shackleford Parish Council (SPC) to the inclusion of the proposed Blackwell Farm development in the draft Local Plan (Policy A26).</td>
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<td>The development at Blackwell Farm was discussed at the July meeting of the Parish Council and the councillors unanimously decided to object to the proposal.</td>
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<td>SPC believes that it will be impossible to minimise the impact of the development on the local road network. Traffic is at a daily standstill where the A3 and A31 enter Guildford. Despite traffic improvement measures included in the proposal,</td>
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SPC believe the infrastructure and network will not be able to cope with the sheer scale of the proposed development (as independent traffic reports confirm).

Shackleford, Puttenham and Compton in particular already suffer with peak time traffic problems as people access the A3 and A31 or divert from those routes when there is the inevitable daily congestion. Introducing more schools, offices and homes to that area will lead to more 'rat-running' through these little villages, whose roads are unsuitable and cannot deal with the congestion. Air pollution in the area is already above safe EU limits and this is due to the volume of traffic and because it is frequently at a standstill.

The site of the proposed development lies within the Green Belt and in an AONB. There are no exceptional circumstances that have been shown to demonstrate the benefits outweigh the harm of the development; therefore there is no exception to the presumption against development in the Green Belt and AONB.

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

Attached documents:

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**Comment ID:** pslp172/4259  **Respondent:** 8605889 / Surrey County Council (Sue Janota)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Policy A26 - Blackwell Farm, Hogs Back, Guildford
We note that the Normandy and Flexford site, which included provision for housing and a new secondary school to serve the west of the borough has been removed from the draft Local Plan. Consequently, we welcome the amendment to Policy A26 which provides for a secondary school within the proposed urban extension at Blackwell Farm. The school is required to meet the county council’s forecasted future need, on the assumption that the development proposed in the Local Plan comes forward. We would like additionally to see it specified that the school is required to be located in the northern part of the site. This is considered to be the most sustainable location in accessibility terms and it would be in accordance with the amendment to SED3.

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

Attached documents:

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**Comment ID:** PSLPS16/7926  **Respondent:** 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

CPRE OBJECTION TO POLICY A26
BLACKWELL FARM, HOGS BACK, GUILDFORD

We fully endorse and support the comprehensive objection to this site by Green Balance which has been made jointly on behalf of CPRE Surrey and the Save Hogs Back campaign.
1. Description

CPRE objects to this site being described as within the “Guildford Urban Area”. It is in fact within Green Belt countryside in Shalford to the single track driveway to Downs Place with its attractive avenue of trees. This development has been objected to by a wide range of Parish Councils including Artington, Compton, Puttenham, Wanborough, and Worplesdon.

1. Ownership

CPRE does not agree with the categorization of this land as “Private” when it is in fact owned by the University of Surrey, a semi public body.

1. Research Park

The Research Park is owned by the University. It still has room to expand on its existing area which was originally allocated as open space so new offices or other buildings could be built similar in design to the WWF HQ in Woking with parking at ground floor level and offices over.

1. Housing

The amount of housing for this site is 1,800 homes and 6 Traveller pitches, together with a primary school. Added to this is provision for a further primary school at the hospital site which will further complicate matters in terms of access and sustainability. It is our opinion that heavy existing congestion at the Egerton Road A3 Roundabout will exacerbate this and a requirement could be achieved by the building of a retirement care home. For some unexplained reason this has been omitted from the draft Local Plan.

1. Infrastructure

Access to this site from the Egerton Road A3 Roundabout via Gill Avenue will become even more congested were the proposed new road to and from the A31 and maybe the building of a new railway station at Guildford West in Park Barn.

A technical report by RGP has been prepared concerning this proposed new road link to and from the A31 which questions the viability of a new road with a possible extra bridge would of course be very unsightly. There are also safety considerations that need to be taken into account.

CPRE questions whether the proposals for this junction is a realistic proposition. RGP indicates that the preferred highways solution would make the proposal unsound.
We do not consider that either of these possible alternatives will provide a practical solution to the traffic congestion that already exists at the A31/A3 junction and that it will be used by a very large quantity of traffic which will stretch back from the A31/A3 junction and the traffic lights at the A31

1. Countryside Harm and Urban Sprawl

From this policy presentation, it is hard to believe that the countryside at stake has been seriously considered. We are talking about an area of outstanding natural beauty Hogs Back countryside which is recognised by everyone who knows it as a unique landscape location. Its magnificent views stretching away to the North. It would surely be unforgivable if this were not conserved for the future rather than irretrievably harmed.

The Pegasus Report on Green Belt and the Countryside has taken the totally arbitrary position that this site should be considered only Green Belt site fulfils these two very important purposes. We concur that the site cannot serve the function of preventing coalescence object to the categorization of this Green Belt countryside as of only “medium sensitivity”, and request that the Inspector walk through have a serious adverse effect on this beautiful natural landscape and protected countryside. This harm will be made even worse at the “exceptional circumstances” required for a Green Belt boundary review which would justify the harm it will cause to this very unii

1. Landscape Evaluation

In 2007 GBC and Land Use Consultants published its Guildford Landscape Character Assessment & Guidance which includes in sector segregation created by the A31 trunk road along the ridgeline with the visibility of moving vehicles and associated noise. This document Preliminary work in this context has already been undertaken by Hankinson-Duckett for Natural England. The Parish Councils of Con inclusion within a revised Natural England boundary for the Surrey Hills AONB.

Accordingly, we believe that it would be illogical to proceed further with the proposal for Blackwell Farm in the light of so much protection in the Local Plan because of its impact on the AONB and the setting of this very special landscape. CPRE OBJECTION.

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

Attached documents:

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Comment ID: pslp172/3883  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)

Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

The CPRE Surrey response to the June 2016 Pre-submission Consultation (Regulation 19) provided a comprehensive objection to this proposal. This appears on pages 17 to 20 of the earlier submission made over a year ago. It featured in particular the serious environmental damage that would be done to the nationally important countryside of the Surrey Hills Area of Outstanding Natural Beauty at the Hogs Back and the major erosion of the Metropolitan Green Belt in the immediate vicinity of Guildford to the West of the town. CPRE considers the outline proposal incomplete and impracticable and therefore unsound.
CPRE Surrey has worked closely from the outset with Save Hogs Back and Compton and Worplesdon Parish Councils. We fully endorse the additional submission now made by them which concentrates in particular on the questions relating to road infrastructure and traffic congestion. This has been prepared by Green Balance. It is apparent that the Council has not been able to find a convincing solution to these problems. The CPRE objections to the draft local plan in this context have not been in any way overcome. No input of any kind has as yet been supplied from Highways England who are concentrating their main attention exclusively on the M25/A3 junction rather than the A3 connection to Guildford and beyond where it joins the A31 at the Hogs Back. The proposals put forward by the Council for the link road to the A31 through Blackwell Farm are in our view wholly unconvincing.

CPRE is conscious of the already unacceptable degree of congestion on the A31 and A3 at Guildford. The development of any additional traffic on these major roads is likely to promote severe infrastructure difficulties. The continued mention of a possible tunnel solution is only an “aspiration” and therefore outside the current plan consideration, which depends in any case on Highways England assessing what is practicable, and this will be linked to cost viability. CPRE nevertheless were involved in the Hindhead Tunnel decision, which took years to achieve because it was thought too expensive for consideration. The success of this development is generally accepted now and the countryside was saved as a result. No doubt this is still a possible outcome at Blackwell Farm which should not be ruled out entirely.

In the meantime the concern of Compton inhabitants is well justified at their experience of air pollution from slow moving diesel traffic of all kinds. CPRE understands that the levels of Nitrogen Dioxide pollution are consistently well above EU legal limits on the main street in Compton (B3000) and that this problem has been recorded over a period of two years. No wonder then that the community is concerned and has objected so strongly to the proposed Blackwell Farm link road to the A31 which it is anticipated will seriously add to the unacceptable traffic and pollution already being experienced by this community. It is surprising that Guildford itself appears not to have in addition more pollution measurement evidence that can be relied on for evaluation of its crowded road system.

CPRE has also seen the report submitted by Worplesdon Parish Council with regard to Surface Water Flood Risk Assessment which was prepared by JBA Consulting. This was needed to review the impact of the proposed development at Blackwell Farm on the downstream communities of Wood Street Village, Fairlands, and parts of Park Barn which have all previously experienced surface water flooding problems. The JBA conclusion is that past experience suggests that development at Blackwell Farm will represent an additional obstacle in terms of flood water control.

The CPRE Surrey objection to Policy A26 and paragraph 4.1.9 therefore remains. In summary it is based on the following additional points:

- It disregards an expert independent landscape study which demonstrates that part of the of the site merits AONB status following Natural England’s forthcoming boundary review (4.3.8)
- It 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
- It 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)
- It will add to air pollution in neighbouring areas such as Compton, which already exceeds safe EU limits for Nitrogen Dioxide.

CPRE Surrey should like to add that the London Green Belt Council has become an active partner with CPRE Guildford in defending the Metropolitan Green Belt against the threat to Blackwell Farm. Their support for CPRE Guildford’s defence of this nationally important countryside reflects the fact that the Green Belt was established on a permanent basis to prevent urban sprawl and protect openness around London and the Home Counties. This reflects too the fact that the Green Belt should act as the lungs of our capital city, where town dwellers can come to breathe fresh air, and that its defence is part of the responsibility of us all including Guildford residents who will benefit from its better protection and enhancement.

The critical importance attached to saving Blackwell Farm and the Hog’s Back is reflected in a short video prepared by CPRE’s National Office that forms an integral element of a national campaign covering different parts of the country.
We stand by the following letter written by Karen Stevens which appeared in the Surrey Advertiser on 30th June 2017:

“The proposed Blackwell Farm development will change the shape and character of the western side of Guildford forever, transforming it from a beautiful (and historic) rural landscape to a suburban housing estate and low-density business park which will be visible along the Hog’s Back. This site, surrounding one of the former manors of Compton (and later the residence of Lord Dennis) is currently high-grade arable farmland. It is criss-crossed with ancient hedgerows and bounded by ancient woodland to its east, an Area of Outstanding Natural Beauty (AONB) to the south, a Site of Nature Conservation Interest (Broadstreet Common) to the north, and open countryside to the west.” CPRE Surrey wishes to see this recognized by the Local Plan which at the present time is unsound.

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

Attached documents:

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Comment ID: pslp172/4174  Respondent: 8607457 / Tom Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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 Blackwell Farm as a development site [Policy A26 & para. 4.1.9]. The proposed Blackwell Farm development will change the shape and character of the western side of Guildford forever, transforming it from a beautiful (and historic) rural landscape to a suburban housing estate and low-density business park, which will be visible along the Hog’s Back.

This site, surrounding one of the former manors of Compton (and later the residence of Lord Dennis), is currently high-grade arable farmland. It is criss-crossed with ancient hedgerows and bounded by ancient woodland to its east, an Area of Outstanding Natural Beauty (AONB) to the south, a Site of Nature Conservation Interest (Broadstreet Common) to the north and open countryside to the west.

Blackwell Farm was supposed to be opened up by the University of Surrey to provide greater public access to the countryside at the 2003 Local Plan when the “permanent” green belt boundary shifted and part of the former Royal Park was swallowed up to allow expansion of the University.

Instead of doing this, the University now has plans to spread Guildford 4km to the west and to build a 3,250-home estate along the Hog’s Back. As part of this, Guildford Borough Council has put forward the site for 1,800 homes in its latest draft Local Plan and has taken the unprecedented step of planning to move the permanent green belt boundary twice in less than 15 years. These plans will be to the detriment of Guildford and should be resisted for the following reasons:

● More roads, but even more traffic:
  ○ The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road).
  ○ An independent traffic study commissioned by Compton Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington would see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000 and B3100.
  ○ There would also be more congestion at the Egerton Road (Tesco) roundabout, which would impede access to the Hospital's A&E unit and cause increased rat running through Onslow Village and Park Barn - This problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.
The Local Plan 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.

- More pollution - Levels of nitrogen oxides that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the past two years (GBC Air Quality Annual Status Report, September 2016). Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

- Loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension to the Research Park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The Local Plan disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]

- More flooding - The Hog’s Back acts as a soak-away for surface rainwater. Once its slopes are concreted over, this water will flow north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (an EU protected habitat).

More reasons to protect Blackwell Farm are set out in a document/brochure produced by Save Hogs Back in 2014 (see Annex B).

The provision of low-density executive homes across green fields is an inefficient and highly destructive way to meet housing needs. With more than 10% of Guildford’s population comprising students, I believe that the University should do much more to provide dedicated, purpose-built and safe accommodation for those wanting to study and enjoy living in Guildford. This would free up much needed space for key workers and families in existing homes closer to the town centre, helping to regenerate these areas and avoiding problems with student homes identified by GBC.

Whilst the University of Surrey seeks to improve its standing in the rankings of universities in the UK (it currently stands around 270 worldwide) so it would do well to emulate those at the top of the world league tables, which provide dedicated residences to over 95% of their students. The University of Surrey provides around half of this.

Traffic

My overall thoughts on traffic were spelt out in a presentation to Guildford Borough Councillors in the council chamber at Millmead in 2014. My comments made at the time are summarised below:

"Traffic disruption and road congestion is a problem in Guildford and the A3 and the A31 get most of the blame. However congestion on these roads is mostly the symptom of infrastructure problems elsewhere, for example:

- the lack of alternative routes west to east across Surrey, means that most journeys pass through the centre of Guildford,
- cars travelling west to east through Guildford can take one of only 3 routes across the A3 and one of only two routes across the river, and
- the roads and junctions through Guildford itself don’t have sufficient capacity at peak times.

These problems cause congestion and tailbacks onto the A3 and A31. This is a particular issue at the Tesco roundabout - the very point where the proposed entrance for the new Blackwell Farm development will emerge and where ambulance access to A&E is vital."
Extra traffic from this massive development built to the west of Guildford (and on the wrong side of the A3) would make the A3 and the A31 grind to a halt. The whole of Guildford would come to a standstill along with any aspirations for economic growth.

The planning inspector recognised this problem more than 10 years ago when Manor Farm was removed from Green Belt. He stipulated that traffic growth generated on University land should be limited to 5%. Today, there is a general perception that traffic is worse than ever and the proposed new development will add many extra cars - adding to the traffic misery throughout the day.

Unfortunately the proposed road through Blackwell Farm from the A31, won’t help either. It will just allow cars from the west to jump the queue to join the Tesco roundabout and then continue on the same route into Guildford (but now joined by hundreds of more cars).

And if this link is intended to simply make life easier for users of the Research Park then, wouldn’t measures to reduce the reliance on cars be better (as the planning inspector’s 5% threshold was trying to achieve)?

We need links to connect between the west and the east of Guildford, but any major scheme (such as a tunneled southern bypass to the A3) would take many years to materialise. Properties built at a reasonable density above the University’s vast surface car parks would provide extra homes in places which are genuinely walkable. Walkable to the existing train station, to the University, to the Research Park and the town. This would allow the University to provide all the benefits it wants to provide to Guildford - without the loss of beautiful countryside and without as much disruption on the roads.

Building hundreds of new homes on Blackwell Farm simply isn’t the answer.”

None of these fundamental issues has been addressed in different drafts of the Local Plan. Despite more evidence being presented by Save Hog’s Back and Compton Parish Council (including the RGP reports), the Local Plan ignores independent expert traffic studies, which show the adverse impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]. The scheme also adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

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

Annex A - GBCS Feedback Local Plan (Dec 14).pdf (2.4 MB)
Local Plan Consultation 2017 response - TES.pdf (225 KB)

Comment ID:  pslp172/4833  Respondent: 8609473 / Darren Williams  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/3116  Respondent: 8627361 / Wanborough Parish Council (James Henry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Wanborough Parish Council has reviewed the proposed revisions to the Local Plan. In general we are supportive of the revisions made, many of which appear to have taken into account the comments and suggestions submitted in respect of previous Local Plan consultations, by local organisations and residents.

In particular we welcome the additional focus on Guildford town centre residential development, the objective of greater containment of student accommodation on Surrey University Campus land (thus reducing pressure on lower cost residential property elsewhere) and a clearer acknowledgement in the Local Plan of the severe existing traffic congestion and road infrastructure and access problems associated with the A3 and A31. Unfortunately however, there appears to be no regional solution or funding in sight to resolve this infrastructure issue.

We believe the A3 / A31 road infrastructure problem is so severe, as evidenced by the daily rush hour traffic jams and local road gridlock in the event of the smallest of accidents on the A3 (or any of its slip roads), that we remain firmly against the proposed Blackwell Farm residential development (Policy A26). For this reason, Wanborough Parish Council is supporting the submission of Compton Parish Council against the development of this specific site.

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

Attached documents:

Comment ID: PSLPS16/4531  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

A26 Blackwell Farm, Hogs Back – Mixed use 1,800 homes, 6 Traveller pitches, employment, Local Centre, school etc.

OBJECT the majority of this land should be designated AONB

• Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary.
• The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board.
• Two fields at the very eastern edge of the Blackwell Farm/Manor Farm site did not meet the AONB criteria. However, these were acknowledged to be important in providing the setting to Guildford and an important transitional landscape.

• The boundary put forward by Surrey Hills AONB Board between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character that might justify exclusion.

• The proposed AONB boundary should be reviewed at this location and realigned according to the recommendations made by Land Management Services Ltd – As per their report entitled “Hogs Back Natural Beauty Evaluation” dated May 2016, as attached.

• Failure to realign the boundary according to Land Management Services Ltd.’s recommendations could enable opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands. The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the following Ancient woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

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

Attached documents:

Comment ID: PSLPS16/4616  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

1. Introduction

Land Management Services Ltd was commissioned by Compton and Worplesdon Parish Councils to undertake a Natural Beauty Evaluation of land to the east of Flexford, in the vicinity of Blackwell Farm, Down Place and Homestead Farm to the north of the Hog’s Back. This evaluation is linked to the ongoing Surrey Hills Area of Outstanding Natural Beauty (AONB) and Surrey County Area of Great Landscape Value (AGLV) boundary review. A report prepared by HDA titled Surrey County Council LCA Phase 2, Surrey Hills AONB Areas of Search, Natural Beauty Evaluation (October 2013) included a natural beauty evaluation of land to the north of the Hog’s Back, as part of the County wide AONB/AGLV boundary review. This review describes Areas of Search extending to the full AGLV boundary with recommended areas for inclusion within a revised AONB boundary based on the findings of the evaluation. The evaluation was undertaken in accordance with ‘Guidance for assessing landscapes for designation as National Park or area of Outstanding Natural Beauty in England (Natural England 2 March 2011).
The HDA report recommends extension of the AONB boundary to the north of the Hog’s Back to include an area described as ‘Area of Wooded Rolling Claylands extending down from the chalk ridge’ (Area 12-1). A copy of the relevant extract from the HDA report including the Natural Beauty Evaluation for Area 12-1 against the Natural England criteria and mapping showing the original Area of Search and recommended area for inclusion within the AONB as part of the boundary review, are included in Appendix 1 to this report.

The 2013 HDA report recommends inclusion of land to the north of the Hog’s Back chalk ridge with a northern boundary broadly defined by West Flexford Lane between the village of Flexford and land on the western edge of Guildford. The conclusions to the evaluation for Area 12-1 state:

‘There is a gently sloping transition northwards from the top of the dip slope, but vegetated roadsides, hedged/treed field boundaries and woodland blocks form a relatively robust east-west northern boundary, beyond which urban influence increase(s) in places’

This evaluation prepared by Land Management Services Ltd has been prepared on behalf of Compton and Worplesdon Parish Councils (with additional support from Wanborough) in order to:

• Provide a more detailed Natural Beauty Evaluation of the areas excluded from Area 12-1 in the HDA October 2013 Report
• Assess the degree to which the excluded areas contribute to the natural beauty and setting of the Hog’s Back
• Provide a comparative assessment of the areas within the original Area of Search included and excluded in Area 12-1

This evaluation has been carried out in accordance with the ‘Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England’ (Natural England, 2 March 2011). Appendix 1 of the Guidance provides an Evaluation Framework for

Natural Beauty Criterion. This describes six criterion or factors with associated sub-factors and example indicators to inform a Natural Beauty Evaluation. The six ‘Factors’ or criteria are:

• Landscape Quality
• Scenic Beauty
• Relative wildness
• Relative tranquillity
• Natural heritage features
• Cultural heritage

The October 2013 HDA evaluation was carried out in accordance with the Natural England methodology and also includes a brief concluding section titled ‘Specific Issues addressed when identifying extent of Area 12-1’.

For ease of comparison the study area evaluation covered by this report is set out to an identical layout to the Study Area sheets within the HDA report (see Appendix 1).

Preparation of this report has involved the following:

• Desk top review of the HDA report, and other earlier landscape assessment reports which have contributed to the boundary review, principally:
  ◦ Review of Landscape Assessments within the AONB (Alison Farmer Associates, March 2012)
  ◦ Surrey Hills AGLV Review (Chris Burnett Associates, 2007)
• Desk top review of County and Borough Landscape Character Assessments:
  ◦ Guildford Landscape Character Assessment and Guidance (Land Use Consultants January 2007)
  ◦ Surrey Landscape Character Assessment – Guildford Borough (HDA April 2015)
• Desk top review of other relevant documentation, principally:
  ◦ Surrey Hills AONB Management Plan 2014-2019
  ◦ Guildford Borough Core Strategy and Local Plan documentation
• Site visit on 28th April 2016
We have also reviewed the Surrey History Centre Historical Maps for the evaluation area, principally the Ordnance Survey 1897 and 1934 editions.

This report is set out as follows:

1. Baseline Landscape Character Assessments
2. Landscape Policy Context
3. The Surrey Hills AONB
4. Evaluation against Natural Beauty Criterion
5. Conclusions and Recommendations

2. Baseline Landscape Character Assessments

Full descriptions and key characteristics for each of the character areas are given in the respective 2007 Guildford and 2015 Surrey LCAs. The Guildford Assessment also includes an Evaluation and overall Landscape Strategy together with Landscape and Built Development Guidance. The recently published Surrey LCA largely adopts the same two principal landscape character areas as described in the Guildford LCA for the land covered by this evaluation. These are:

- Wanborough Wooded Rolling Clayland(s)
- Hog’s Back Chalk Ridge

The Guildford LCA also includes a Rural-Urban Fringe Assessment which describes two sub character areas on the western edge of Guildford:

- Wanborough Wooded Clay Lowlands: Rydeshill-Fairlands Rural-Urban Fringe
- Hog’s Back Rural-Urban Fringe

2.1 Wanborough Wooded Rolling Clayland(s)

The majority of the land covered by this evaluation is located within the Wanborough Wooded Rolling Claylands Character Area. The description of the character area in the Guildford LCA includes this reference to the land in the vicinity of Down Place:

‘There are many mature hedgerow trees and occasional field trees, often oaks, the remnants of former hedgerows and woodlands or of 18th century parkland for instance at … Down Place to the far south east of the area’

The Guildford LCA also references the twelfth century deer park including the remnant features of ‘Strawberry Grove and hedgerow boundaries representing the former extent of the park’, on the western edge of Guildford. The Surrey LCA references ‘historic landscape patterns’ as a key characteristic.

The Guildford LCA also highlights the importance of ‘Views to the unsettled chalk ridge of the Hog’s Back form a rural backdrop to the area’.

This attribute is also identified in the Surrey LCA

These aspects combined with a ‘peaceful rural character’ are identified as some of the key attributes of the Wanborough Wooded Rolling Claylands Character Area.

The Rydeshill-Fairlands Rural-Urban Fringe assessment (described in the Guildford LCA) identifies the importance of the land on the western edges of Guildford in ‘containing residential sprawl and creating the sense of a quick transition from the town to rural landscape.

The southern-most section of the area covered by this evaluation falls just within the Hog’s Back Chalk Ridge.

2.2 Hog’s Back Chalk Ridge
Both the Guildford and Surrey LCAs identify the drama of the chalk ridge and the panoramic views, north and south as defining characteristics of the Hog’s Back. Both the Surrey and Guildford LCAs identify the significance of views to and from the ridge. The more regular field pattern associated with the chalk downland is identified in both assessments. The Guildford LCA also references the importance of the historic parkland, with remnant parkland trees associated with Down Place, Flexford House and Poyle Park. Both assessments identify the noise and visual impacts associated with the A31 as detracting features.

The Guildford LCA Hog’s Back Rural Urban Fringe assessment references the importance of the land in providing ‘the setting to and views from Guildford’ and the desire to maintain the ‘essentially undeveloped rural character’ of the land. The assessment notes that:

*The setting of Guildford and the AONB are both highly sensitive to any small scale incremental change.*

3. **Landscape Policy Context**

Paragraph 115 of the National Planning Policy Framework (NPPF) states:

> Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.

This principle is taken forward in planning policy at a local level in the Guildford Local Development Framework and Local Plan. The Guildford Planning documents also reference the relative importance and weight to be attached to land within the AGLV, subject to the AONB boundary review.

4. **Surrey Hills AONB**

The Surrey Hills AONB is described in the AONB Management Plan as ‘an intriguingly diverse landscape characterised by hills and valleys, traditional mixed farming, a patchwork of chalk grassland and heathland, sunken lanes, picturesque villages and market towns’. The AONB encompasses both the North Downs and Greensand Hills with intervening lowlands and valleys. It is a landscape with a diverse underlying geology and as, a consequence, enormous diversity in the features which define and characterise the AONB. The definition of Natural Beauty as referenced in the AONB Management Plan also recognises the influence of human intervention and management on the beauty of the AONB:

> ‘Natural Beauty is not just the look of the landscape but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries’

Areas of Outstanding Natural Beauty: A Guide for AONB Partnership Members, Countryside Agency, 2001 (CA 24) These are important considerations in this Natural Beauty Evaluation, since in assessing whether land within the AGLV merits inclusion within the AONB, this should be evaluated against all landscape typologies or characteristics associated with the whole of the AONB, not just the landscape feature immediately adjoining the land, in this case the chalk ridge of the Hog’s Back.

5. **Evaluation against Natural Beauty Criterion**

The HDA recommended area for inclusion within the AONB (Area 12-1), as described in the HDA October 2013 report, is shown on the extract from the supporting plan to the report below (Figure 1). The full Area of Search and proposed area for inclusion within the revised AONB boundary are shown on the drawing included with Appendix 1. Figure 2 (overleaf) shows the current AONB Boundary, Area 12-1 and the five sub character areas identified as part of this evaluation. The remainder of this section includes a Natural Beauty Evaluation of a series sub character areas identified as part of this evaluation, against the Natural England Criteria, together with photographs illustrating the character and condition of the landscape. These are presented in the form of a table consistent with the HDA evaluation. The final section of each table includes an assessment of the key qualities of each sub character area and an assessment of the relationship between the sub character area with the adjoining areas within Area 12-1. This section also assesses the natural and scenic beauty of the landscape in the context of key characteristics associated with the whole of the Surrey Hills AONB and concludes whether each sub character area should have been included as part of Area 12-1. Representative viewpoint locations included in the evaluation are shown on Figure 4 (Appendix 2).
Figure 1: Extracts from HDA Plans showing the Area of Search (left plan) and proposed Area 12-1 for inclusion within the revised AONB (right plan)

Figure 2 LMS Sub Character Areas

| Location/Sub Character Area |  |
|-----------------------------|--
| Area 1 Land to the east of Flexford |  |

**Landscape Quality**

Stronger urban influence on fringes of Flexford. Planted woodlands and field boundaries in variable but mainly good condition. Landscape pattern typical of smaller field pattern around Flexford and Wanborough. Few large woodland blocks. No ancient woodland.

**Scenic Quality**

Less distinct character than land south of West Flexford Lane which has strong visual and physical relationship with chalk ridge of the Hog’s Back. Lane provides physical and visual separation. Properties influence rural character on the edge of the settlement and along the lane.

**Relative Wildness**

Settlement edge and traffic noise. Managed arable landscape.

**Relative Tranquility**

Traffic noise from A31 evident but not intrusive. Other influences associated with settlement edge.

**Natural Heritage Features**

Relatively indistinct natural landscape pattern or irregular fields bordered by hedges with few strong or defining landscape features. No larger woodland blocks of ancient woodland.

**Cultural Heritage**

No known major cultural heritage associations.

**Relationship with Area 12-1 and Conclusions**
This sub character area is visually and physically distinct from Area 12-1. The landscape lacks a strong or defining character and bears little relationship with Area 12-1 and is not significant in views to and from the Hog’s Back.

Agree with the boundary to Area 12-1 as shown. Area does not merit inclusion within the AONB.

**Location/Sub Character Area**

Area 2 Land to the east of Pond Hill

**Landscape Quality**

Declining influence of settlement on landscape character. A few isolated properties on west Flexford Lane. Landscape of larger fields with broad views to both the north and south. Landscape character and pattern and land use very similar north and south of the lane. No ancient woodland.

**Scenic Quality**

Large field pattern, but with wide expansive views to the, mainly to the south. Few significant landscape features or defining characteristics.

**Relative Wildness**

Managed arable landscape, but declining influence of settlement edge. Broad views with few visual detractors such as pylons or incongruous built development.

**Relative Tranquillity**

Traffic noise from A31 evident but not intrusive.

**Natural Heritage Features**

Large fields with indistinct field pattern. Woodland fringes to east associated with Wildfield Copse.

**Cultural Heritage**

No known major cultural heritage associations.
Relationship with Area 12-1 and Conclusions

The character, condition and quality of the landscape are very similar south of the lane (within Area 12-1) and north (outside Area 12-1). The landscape north and south of the lane is, however, assessed of being of relatively indistinct landscape character and of relatively low landscape and scenic quality. Land south of the lane is, however, of significantly greater importance in forming the lower areas of the dip slope to the Hog’s Back and is highly visible from the crest of the ridge, and therefore merits inclusion within the AONB, as currently proposed.

Agree with the boundary to Area 12-1 as shown. Area does not merit inclusion within the AONB.

Viewpoint 2: View north of West Flexford Lane (outside Area 12-1)

Viewpoint 3: View south of West Flexford Lane towards the Hog’s back showing land within Area 12-1

Location/Sub Character Area

Area 3 Land to the east of Wildfield Copse and north of Down Place

Landscape Quality

Distinctive rural parkland character with strong landscape pattern defined by managed hedges with mature oak hedgerow trees together with a number of woodland blocks and copses including areas of ancient woodland (see Viewpoints 4 and 5). In many respects this landscape has a more distinct character and enhanced quality when compared with much of the land to the west included within Area 12-1.

Scenic Quality

Strong sense of place with distinct landscape pattern with many defining elements, in particular the mature parkland trees, woodland blocks and managed hedgerows. Glimpsed views of Down Place and Blackwell Farm add to distinctive local character.

Relative Wildness

Managed arable landscape, but with little or no urbanising influences. Impact of A31 is reduced as road is not visible and noise impacts seem reduced.

Relative Tranquillity

Greater sense of tranquillity relative to land to the east and south east due to the declining influence of the A31.

Natural Heritage Features
Strong landscape pattern with origins dating back largely to 18th century parkland associated with Down Place. A number of substantial woodland blocks including smaller areas of Ancient Woodland associated with Wildfield Copse.

**Cultural Heritage**

Former parkland associated with Down Place.

**Relationship with Area 12-1 and Conclusions**

The landscape has a distinct parkland character with high landscape and scenic qualities. In many respects the relative wildness and tranquillity are assessed as being greater than adjacent land within Area 12-1. The landscape shares many defining characteristics and attributes associated with lowland estates elsewhere within the Surrey Hills AONB. The boundary to Area 12-1 cuts across this landscape and does not seem to follow any clear landscape features or reflect a defining change in landscape character, quality and scenic quality.

Area does merit inclusion within the AONB on the basis of distinctive landscape character and scenic qualities. It is recommended that the boundary to Area 12-1 be reviewed to follow the southern edge of Wildfield Copse.

Viewpoint 4: View south east from public footpath to the south of Wildfield Copse. The parkland landscape shown in this view currently lies outside Area 12-1

Viewpoint 5: View north from the southern edge of sub character Area 3. The proposed boundary to area 12-1 runs through the centre of the field

**Location/Sub Character Area**

Area 4: Land to the east of Down Place and in the vicinity of Blackwell Farm

**Landscape Quality**

There is a strong visual and physical relationship between this sub character area and the chalk ridge of the Hog’s Back, which extends to the woodland bordering the railway line. Viewpoint 6 shows the southernmost section of this character which forms the lower sections of the dip slope to the Hog’s Back and the boundary with the AONB. This is a classic downland landscape of comparable landscape quality to the areas to the west which have been included in Area 12-1. The land further north maintains this distinctive character (see Viewpoint 7) and as illustrated in Viewpoint 11 is critical to the landscape setting of the Hog’s Back chalk ridge. This character area also includes one of the largest blocks of Ancient Woodland associated with the Hog’s Back in the form of Strawberry Copse and Manor Copse.

**Scenic Quality**

A distinctive downland landscape of comparable landscape and scenic quality to land within the existing AONB boundary. The northern areas are critical to the landscape setting of the chalk ridge and are therefore considered integral to the character and scenic quality of the AONB.
### Relative Wildness

Characteristic managed arable landscape. The impact of the A31 is more significant in the southerly sections on the fringes of the existing AONB boundary. The relative wildness of this area increase further north as the influence of the A31 declines. There are limited visual, noise and landscape character impacts associated with the western edge of Guildford, despite the relatively close proximity of development and the size of the settlement (see also Sub Character Area 5).

### Relative Tranquility

Greater sense of tranquillity to the north as a consequence of the declining influence of the A31.

### Natural Heritage Features

The southern sections provide a typical downland landscape. To the north the landscape patterns reflects origins dating back to 18th century parkland associated with Down Place. This sub character area also includes significant areas of Ancient Woodland.

### Cultural Heritage

In addition to the former parkland associated with Down Place, the land lies on the western fringes of the former medieval deer park.

### Relationship with Area 12-1 and Conclusions

The landscape has a strong physical and visual relationship with the existing AONB and is considered critical in maintaining the rural character and quality of views from the Hog’s Back (see Viewpoint 11). Much of the landscape is typical of downland on the dip slope to the Hog’s Back of comparable landscape and scenic quality to much of the land included within Area 12-1 further west(see Viewpoint 10). The landscape shares many defining characteristics and attributes associated with chalk downland within the Surrey Hills AONB.

This area merits inclusion within the AONB on the basis of distinctive landscape character and scenic qualities and the strong visual relationship with land within the existing AONB. It is recommended that the boundary to Area 12-1 be reviewed to follow the western edge of Wildfield Copse and the narrow woodland screen bordering the railway line to the north.

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**Image 9**

Viewpoint 6: View west from the area of publicly accessible land north of Manor Copse showing the southermost section of sub character area 4, on the dip slope to the Hog’s Back. The existing AONB boundary is located just below the wooded ridge line (the dashed line shows the approximate line of the existing AONB boundary). The lower slopes are not proposed for inclusion within Area 12-1.

**Image 10**

Viewpoint 7: View south from the southern edge of sub character area 4 towards the Hog’s Back

### Location/Sub Character Area
Area 5: Guildford Settlement Edge

Landscape Quality

The landscape, in particular to the north (see Viewpoint 8), retains a strong rural character despite the proximity of urban development on the western edge of Guildford. Urban development and influence of the A31 are more significant to the south (see Viewpoint 9), although this area is assessed as being of particular importance to the setting of the AONB with dramatic views to and from the chalk ridge (see Viewpoints 6 and 11). The distinctive character and rural qualities diminish in the eastern sections of this sub character area, but this forms an important buffer and transitional area on the western edge of Guildford.

Scenic Quality

The principal scenic qualities associated with this sub character area lie in the outward views towards the Hog’s Back and rural land to the east. The northern sections retain something of a rural downland character, but this is not considered a landscape of high scenic quality.

Relative Wildness

Despite the proximity of the settlement edge, the northern sections retain a degree of wildness which is comparable with the more rural areas further west.

Relative Tranquillity

Similar to the assessment of relative wildness, there is a greater sense of tranquillity to the north as a consequence of the declining influence of the A31. There are surprisingly limited effects on tranquillity as a result of the proximity to Guildford, with much of the built development largely screened and limited associated noise impacts. There is some evidence of fly tipping and other activities which detract from rural character and sense of place.

Natural Heritage Features

The principal natural heritage features of interest are associated with the ancient woodland at Strawberry and manor copses.

Cultural Heritage

The land lies within the area covered by the former deer park and features such as deer leaps can be observed.

Relationship with Area 12-1 and Conclusions

The landscape forms an important buffer and transitional area on the western edge of Guildford. Although the overall landscape and scenic quality would not necessarily merit inclusion within a revised AONB boundary, the landform and woodland cover significantly reduce the potential impact of Guildford on the land further west, including views from the eastern end of the Hog’s Back.
This area does not merit inclusion within the AONB, but provides an important buffer and transitional landscape on the western edge of Guildford. It is recommended that the boundary to Area 12-1 follows the western edge of this sub character area but includes Strawberry and Manor Copses. The semi-rural transitional character of this landscape should be retained in order to conserve the currently limited impact of Guildford on the AONB and other rural land to the west.

Viewpoint 8: View south east towards Guildford from the northern edge of sub character area 5.

Viewpoint 9: View west towards Guildford from land in the southern part of sub character area 5

1. Conclusions and Recommendations

This Natural Beauty Evaluation has been carried out in accordance with the guidance produced by Natural England. Five landscape sub character areas have been identified as part of this study, based on an assessment of existing landscape character. These five sub character areas have been evaluated against the Natural England criteria and compared against the qualities and character of the adjoining land, in particular those areas proposed for inclusion within the revised AONB boundary as Area 12-1. The section below provides an overview of the Natural Beauty Evaluation for the study area and includes recommendations for revisions to the current proposed AONB boundary in the eastern part of the study area, in the vicinity of Down Place and Blackwell Farm. The current AONB boundary, proposed Area 12-1 and the recommended AONB boundary extension as part of this evaluation are shown on Figure 3 (above).

This report agrees with the conclusions of the HDA evaluation with regard to the proposed revised AONB boundary to the east of Flexford (sub character areas 1 and 2), although it is noted that land within sub character area 2 is broadly similar in terms of quality, character, condition and appearance to land south of West Flexford Lane (included within Area 12-1). This evaluation concludes that the landscape quality of the land north of the lane does not, however, merit AONB designation and is not of particular significance to the setting of the Hog’s Back, in terms of both landscape character and views to and from the chalk ridge.

This evaluation does, however, conclude that land to the south and east of Wildfield Copse, in the vicinity of Down Place and Blackwell Farm (sub character areas 3 and 4), is of a landscape and scenic quality, character and condition which should merit inclusion within a revised AONB boundary. The landscape represents many of the defining characteristics of landscapes within the Surrey Hills AONB. These two sub character areas include land on the upper slopes of the Hog’s Back ridge which is representative of classic chalk downland and areas on the lower slopes typical of former parkland estates, with field patterns and mature trees and large blocks of ancient woodland providing strong evidence of the landscape and cultural heritage of the local area. This landscape is therefore considered integral to the AONB and critical to the conservation of rural views to the north of equal if not greater importance to land to the west of Down Place included in Area 12-1 (see comparative Viewpoints 10 and 11).

The proposed boundary to Area 12-1 between Misley Copse and Down Place and between Down Place and the current AONB boundary and does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character (for instance increased urban influences) which might justify exclusion. This evaluation recommends that the proposed AONB boundary should be reviewed in this location and re-aligned as recommended in this report (see Figure 3). Failure to do so could enable opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Although not recommended for inclusion in the revised AONB boundary this evaluation notes the importance of the eastern most sections (sub character area 5) in providing the setting to Guildford and an important transitional landscape.
Viewpoint 10: View north west from Footpath 480 from just below the crest of the Hog’s Back ridge. The existing AONB boundary runs east to west approximately through the centre of this field at the base of the steeper areas of the dip slope. The area proposed for inclusion within the AONB as part of the HDA evaluation (Area 12-1) extends beyond the lower field boundary to include substantial areas further north (shown approximately by the dashed lines).

Viewpoint 11: View north east from Footpath 480 from just below the crest of the Hog’s Back Ridge. The existing AONB boundary runs east to west approximately through the centre of this field at the base of the steeper areas of the dip slope (the small clump of pines lies within the existing AONB). The area proposed for inclusion within the AONB as part of the HDA evaluation (Area 12-1) extends this to include the land around Down Place. The proposed areas for inclusion within the AONB as part of this report would include the fields beyond Down Place, enclosed by woodland and land further east (see Viewpoint 6). The dashed lines indicate the approximate boundaries of the existing AONB, Area 12-1 and the LMS recommended AONB extension.

Appendix 1: Extracts from Surrey County Council LCA Phase 2 Surrey Hills AONB Areas of Search Natural Beauty Evaluation (HDA October 2013)

6.1.11 Chalk Ridge and Wooded Rolling Claylands RECOMMENDED ADDITIONAL AREA 12-1

Area of Wooded Rolling Claylands extending down from the Chalk Ridge.

LANDSCAPE TYPE: E – Wooded Rolling Claylands

CHARACTER AREA: E1 – Wanborough Wooded Rolling Claylands

NATURAL BEAUTY CRITERIA

Landscape Quality

Includes large blocks of ancient woodland, such as Wanborough Wood. Field sizes are relatively large and continuous, following gentle slopes down from the Hog’s Back. Occasional glimpses of traffic on the A31 along the Hog’s Back, but no significant incongruous elements present in the vicinity.

Scenic Quality

Patchwork of fields and woodland rising gently up the dip slope towards the ridge, form an appealing pattern which can be appreciated as one travels through the landscape, either from the Hog’s Back, or from footpaths, tracks and roads to the north.

Relative Wildness

There are few roads, very limited settlement and large areas where access is limited to tracks. This lack of activity, combined with a number of woodland blocks results in a sense of remoteness in most parts. Filtered urban influence from Flexford and Ash Green reduce remoteness slightly to the north.

Relative Tranquillity

Contributors to tranquillity such as birdsong, peace and quiet, and natural-looking woodland dominate minor detractors such as glimpses of vehicles on the A31, to result in a substantially tranquil area.
Natural Heritage Features

Woodland on the gently rising dip slope contributes to the scenic quality of the area.

Cultural Heritage

Historic vernacular buildings at Wanborough Manor.

SPECIFIC ISSUES ADDRESSED WHEN IDENTIFYING EXTENT OF AREA 12-1

Largely unsettled (with the exception of Wanborough Manor area), sloping dip slope of the chalk ridge to the south. There is a gently sloping transition northwards from the top of the dip slope, but vegetated roadsides, hedged/treed field boundaries, and woodland blocks form a relatively robust east-west northern boundary, beyond which urban influence increase in places.

See attachment for images.

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

Attached documents:  [Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf](Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf) (6.1 MB)

<table>
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<tr>
<th>Comment ID: pslp172/4206</th>
<th>Respondent: Worplesdon Parish Council (Gaynor White)</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</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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**OBJECT** the majority of this land should be designated AONB

- Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary.

- The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board.

- Two fields at the very eastern edge of the Blackwell Farm/Manor Farm site did not meet the AONB criteria. However, these were acknowledged to be important in providing the setting to Guildford and an important transitional landscape.
The boundary put forward by Surrey Hills AONB Board between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character that might justify exclusion.

The proposed AONB boundary should be reviewed at this location and realigned according to the recommendations made by Land Management Services Ltd – As per their report entitled “Hogs Back Natural Beauty Evaluation” dated May 2016, as attached.

Failure to realign the boundary according to Land Management Services Ltd.’s recommendations could enable opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands. The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the following Ancient Woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

The Parish Council wishes to express concern about how the link road will be controlled and how access and egress will be managed and refer to RGP’s Technical Note Ref: SHBL/16/3174/TN02 dated June 2017, which was jointly commissioned by Compton Parish Council and Worplesdon Parish Council, as attached. Additional accesses are required despite the number of dwellings being reduced.

For any Research Park development the surface water drainage needs to be fully attenuated within the proposed development area to protect existing communities. In addition any changes that will affect the hydrology of Whitmoor Common SPA/SSSI need to be carefully assessed.

Also submitted is a Surface Water Flood Risk Assessment from JBA Consulting dated July 2017 which concludes that risk from surface water run-off as a result of the proposed change from agricultural to urban use WILL increase in Wood Street Village, Fairlands, The Research Park and Park Barn area of Guildford in the event this site is taken forward within the Draft Local Plan. Policies P4 and P5 refer.

Worplesdon Parish Council fully supports the s19 submission made by Green Balance on behalf of Compton Parish Council, as attached.

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

Attached documents:  
- Response to GBC Reg19 by SHB & ComptonPC Jul17 Final.pdf (631 KB)
- 2017s5991-worplesdon-parish-council-sw-fra-v4-july-2017.pdf (15.5 MB)
- RGP Technical Note - 2017-06-28 TN02 (3).pdf (246 KB)
There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. 1.1.1 Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. 1.1.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. 1.1.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. We question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will add additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. We question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact
resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” We consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

Attached documents:

Comment ID: pslp172/4917  Respondent: 8654849 / David Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/2104  Respondent: 8667425 / Onslow Village Residents Association (Anthony Jacques)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

Attached documents:

Comment ID: PSLPS16/5968  Respondent: 8674273 / Rachel May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I, the undersigned am in complete objection to the land at Blackwell Farm being built upon. We have a young family, and we regularly go to walk and play in the land and woods adjacent to the Research Park and enjoy the skylarks singing and the views where all but the cathedral tower is blocked by the mature woodland.

We are dismayed that this proposal is still on the Guildford plan and ask for it to be rejected on the following grounds.

**True boundaries of Area Outstanding Natural Beauty**

To build on Blackwell Farm and the Hogs Back would blight the views of the wonderful Surrey landscape for miles and miles. The beauty of the land should not be overruled by developers.

This also includes the land up to the current Research Park boundary, as if these are built upon, this will be seen from the Hogs Back and ruin the views from the top. And therefore undermine the designation as an AONB.

Surrey University's proposal to build properties to high environmental standards that would be sympathetic to the locality is completely unachievable, as any building on that land would be to the detriment of the AONB.

There is already a recycling centre on the southern side of the Hogs Back which is an eye-sore and can be seen from the ridge, surely Surrey County Council is not going to do the same on the northern face of the ridge.

All of the land earmarked is either an Area of Outstanding Natural Beauty, Area of Great Landscape Value or Greenbelt and should be protected by law.

**Building on Greenbelt**

Originally defined to stop Urban sprawl, I feel that it is illegal and immoral to keep changing the boundaries of the Greenbelt, and this proposal should not be included.
**Risk of flooding to local area**

The Hogs Back, one of the highest points in the area, naturally drains onto Blackwell Farm, this then drains in to Park Barn. Currently there is insufficient waste water infrastructure for this site.

This is a huge concern to us as if our house were ever flooded it would affect our insurance premiums and make our house price fall considerably. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

**Surrey University's poor use of the land that they have already developed**

A brief walk through the Research Park, or University Campus will soon show you that the University does not build things to high enough environmental standards. A lot of the buildings are uncomfortable with poor ventilation.

To allow a further 10 – 11ha extension to the Research Park when they have made such poor use of the land they have already built upon will be a huge disappointment.

Their history so far does not show any evidence that they will make any environmental considerations, it will purely be financial.

**Proposed railway station**

This will be to the detriment of the local residents in Park Barn despite what the Local plan says. Firstly due to the added noise and light from this, and the train station will be a blight on the area for many of this.

It is also proposed that it will serve existing housing developments. This is unnecessary as there are two extremely good bus routes from Park Barn to Guildford.

**Traffic**

To build the road that will provide access to the proposed development on an already busy junction of the A3 and A31 is ludicrous. The road will also be on the ridge of the Hogs Back, therefore visible for miles around and a blight to the local area.

To provide access from Gill Avenue will only add to the traffic on the west of Guildford around Park Barn, the Hospital and Research Park.

**Services**

There are already not enough school places on the proposed development side of Guildford, short-sighted planning by previous councillors...
Pollution

I have already mentioned the noise and light pollution that comes from the Research Park, added to the additional light and noise pollution from the proposed development, this again would be to the detriment of the current AONB.

Wildlife Habitat

The land proposed to be built upon has a huge selection of natural flora and fauna: nesting skylarks, deer, kites, ancient woodland, nightjar, orchids, to name a few.

Ancient Roman Road and Settlement

The land to the rear of the Research Park has huge historic value, and is a scheduled ancient monument, this area should not be developed on.

Unable to afford rural house prices

We chose our house because although it is in a town, it is right next to an area of natural beauty, and fields that you can walk through.

Green spaces

We do not believe that the University will provide enough green spaces - certainly how could they provide such long vistas as are already there.

True green spaces, and not manufactured ones are vitally important for the emotional and physical health of people. Anything that was there when we moved to the area is now disused and barely maintained.

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

Attached documents:

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Comment ID: pslp172/1990  Respondent: 8684833 / Adrian Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1125  **Respondent:** 8687041 / Michael Aaronson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

If this Policy is adopted provision should be made at the developer's expense for improved public right of way crossing of the A31 so that those walkers denied access to the Blackwell Farm site are able more easily to access the south side of the Hog's Back. At present one has to take ones life in one hands every time one tries to cross it on foot.

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

Attached documents:

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**Comment ID:** PSLPS16/208  **Respondent:** 8694849 / David Swinerd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

The proposal to build on Blakewell Farm is not justified as the farm is in the Greenbelt and is an area of natural beauty visible from one of Guildford's major landmarks, The Hogs Back. With developments being proposed for Normandy and Tongham development at Blackwell Farm will lead to the urbanisation of Guildford westwards to eventually join up with Aldershot with very little green space in between.

There would be no need for a development of this size if the University had by now met its obligations in building a student village for 7000 or so students at Manor Farm which was originally planned when that land was taken out of the Greenbelt a number of years ago. I understand that the University has still some way to go to meet the original planned numbers and if these had been met or exceeded then some 1200 to 1500 houses in the borough would have been available by now for the town's residents to buy or rent.

The proposals for a development of this size would mean that the infrastructure west of Guildford which is now at breaking point will seize up completely even with the new link roads that have been proposed as they will eventually lead onto the existing road system somewhere in the borough.

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

Attached documents:
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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I OBJECT strongly to the University’s planning application in this Local Plan to build 1800 homes on Blackwell Farm along with businesses, offices, supermarket, school and Traveller accommodation.

- Blackwell Farm site is located partly within the Surrey Hills AONB which the NPPF states “should be afforded the highest level of protection.”
- This is a major swathe of Green Belt land comprising 139 hectares of Green Belt land. Statistics show that 139 hectares is more land than was taken out of the Green Belt across the whole of England in the 12 months to March 2012.
- The Green Belt boundary was established 11 years ago when Manor Farm was taken out of the Green Belt and gifted to the University so that they could build student accommodation.

Blackwell Farm fulfils all 5 functions of the Green Belt: (NPPF para 80)

- To prevent urban sprawl from London.
- To check the unrestricted sprawl of large built up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns. (Guildford is an historic town)

NPPF para 79 states that:

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

NPPF 83 states that:
• “Once established, Green Belt boundaries should only be altered in “exceptional circumstances”
• “Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstance”

The NPPF (section 9 para 83) states that “boundaries should be defensible and permanent and capable of enduring beyond the Plan period.

• Part of this area to be built on is registered as an AONB.

GBC would have to show “exceptional circumstances” in order to build on an AONB in the Green Belt.

• It would have a devastating impact on the AONB from an aesthetic and environmental perspective.

The panoramic views from the Hogs Back form an important part of Guildford’s landscape heritage – you can see the cathedral from here.

• It has an ancient woodland which the University promised to protect in 2003 when it was given Manor Farm along with the ancient monument and Hazel Farm.
• Blackwell Farm has many public footpaths and bridleways which offer extensive walking, horse riding and bicycling to local residents and visitors to Guildford.
• ENDANGERED SPECIES: The Hogs Back is the only steep, north-facing chalk ridge in the southeast and is home to some rare plant species and many protected animals and birds.
• There are a number of endangered species which inhabit the Hogs Back – skylarks, little owls, yellow hammers and curlews – all in decline.
• FARMING: Blackwell Farm is a working farm. It is good quality agricultural land. With the proposed increase in population in the South East there will be greater pressure on food resources so we need to protect our ability to provide food and crops for this country in the future years. Statistics show that 40% of food consumed in Britain is imported and this figure will be rising.
• FLOODING: This land is formed of chalk and currently soaks up a significant amount of surface water. If it is developed and concreted over, this surface water run off would exacerbate existing flooding problems in Wood Street Village and Fairlands.
• INFRASTRUCTURE: The A31 is already a congested road onto the A3 Guildford bound and an extra 4-5000 cars generated will bring it to a standstill.
• It would be controversial to build roads across an AONB and an exit road through to the Research Park / Tesco roundabout would add enormously to the traffic congestion already experienced at this junction – the ambulances would not be able to get through to the RSCH.

Thames water does not have sewerage capacity to cope with a development of this scale.

Once again this shows greed by our University who were given this land for safe keeping. They have already broken many promises made for Manor Farm in 2003. If this development goes ahead they are likely to make hundreds of millions of pounds on housing which will be worth 1bn – a lucrative business deal for them which is not going to benefit the residents of Guildford and the loss of some very beautiful AONB Green Belt land.

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

Attached documents:

Comment ID: pslp172/635  Respondent: 8706625 / Hilary Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/743  Respondent: 8706625 / Hilary Barker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We 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:

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- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/2005  Respondent: 8717857 / Mike & Margaret Pusey  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Comment ID: PSLPS16/6236  Respondent: 8727457 / Nuala Crampin  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Hogs Back development
I strongly disagree with this proposed development as it is violating green belt and an A.O.N.B. and will remove from the environment of the town one of its major attractions in the form of its rural character. Furthermore the local infrastructure, especially of roads and water drainage is insufficient to support the development. If implemented it will increase the water-logging problems on Broad Street Common, Pound Lane and the area of Wood Street Village, and exacerbate the already acute traffic congestion on that side of Guildford.

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

Comment ID: PSLPS16/1891  Respondent: 8728545 / Power Race Graphics (Darren West)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

• Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat running through local roads
• Add to Guildford’s pollution

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

Comment ID: PSLPS16/7615  Respondent: 8728865 / Neville Bryan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Mixed use 1,800 homes, 6 Traveller pitches, employment, Local Centre, school etc.

Object

This area is Greenbelt. Despite suspect evident, Greenbelt Study evidence, it does meet all purposes of the Greenbelt and should be rejected on this basis alone.

As a result of a recent study (June 2016) by Land Management Services Ltd, we now know that most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary.

The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board.

Two fields at the very eastern edge of the Blackwell Farm/Manor Farm site did not meet the AONB criteria. However, these were acknowledged to be important in providing the setting to Guildford and an important transitional landscape.

The boundary put forward by Surrey Hills AONB Board between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character that might justify exclusion.

The proposed AONB boundary should be reviewed at this location and realigned according to the recommendations made by Land Management Services Ltd – As per their report entitled “Hogs Back Natural Beauty Evaluation” dated June 2016, as attached.

Failure to realign the boundary according to Land Management Services Ltd’s recommendations could enable opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands.

A development in this location would have a significant negative effect on the wonderful biodiversity of the region. We note that dormouse and insect monitors for study were placed around 2014 (date not recorded) and within 2 weeks of being placed in hedgerows and on field boarders, the hedges and grass areas were cut. We are therefore will be surprised if there are studies showing poor bio diversity.

The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the following: Ancient Woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

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

Attached documents:
Object - Mixed use 1,800 homes (1500 in plan period), 6 Traveller pitches, employment, Local Centre, school etc.

All original objections remain - Additional comments.

(Allocation 9) Adding a secondary school will exaggerate the already unacceptable traffic situation. The RGB technical note produced for Compton and Worplesdon parish councils dated June 2017. Highlighted this and access to this site is along existing congested roads. The 20% uplift on the A3 in 2011 was never addressed, and this will have a similar impact on the A31, and feed roads. This will exaggerate the already unacceptable traffic situation.

Also noted, is that the two areas proposed are through points

- Southern access is through a protected AONB per policy
- Eastern Access is through/next to Ancient Woodland

(Infrastructure 3 ) Control of through traffic (turning the new estate in to a run like Park Barn and Wood Street already are) will be unenforceable.

Surface water run of will be uncontrollable.

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

Attached documents:

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Comment ID: pslp172/1214  Respondent: 8729025 / Richard Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: PSLPS16/8004  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
This response focuses on the proposed allocation of Blackwell Farm as a major development area in Policy A26, together with associate Save Hogs Back and Campaign to Protect Rural England (Surrey) object to the Proposed Submission Local Plan on the following grounds:

Legal compliance:

1. Failure to have regard to national policies and advice contained in guidance issued by the Secretary of State, in respect of policy on Green Belt and Areas of Outstanding Natural Beauty (Planning and Compulsory Purchase Act 2004, s19(2)(a)); and
2. Failure to have regard to the resources likely to be available for implementing the proposals in the document, in respect of the infrastructure requirements needed to allow the Blackwell Farm development (Policy A26) to proceed (Planning and Compulsory Purchase Act 2004, s19(2)(i)).

Soundness:

1. The proposals to remove land from the Green Belt at Blackwell Farm and to promote development there within and in the setting of the Surrey Hills Area of Outstanding Natural Beauty are not consistent with Government policy;
2. The proposal to develop land at Blackwell Farm is not justified as this is not the most appropriate strategy when considered against its reasonable alternatives;
3. The proposal to develop land at Blackwell Farm would not be effective as it is not deliverable over the Plan period due to the impracticability of access and high infrastructure.

This submission sets out the grounds on which Save Hogs Back and Campaign to Protect Rural England (Surrey) support these challenges to the Plan. We ask that:

1. Policy A26 Blackwell Farm, Hogs Back, Guildford be deleted;
2. The Blackwell Farm site remains in the Green Belt;
3. The housing provision in the Plan be reduced by 1,800 dwellings;
4. The infrastructure provision associated with Blackwell Farm be dropped.

Access to Blackwell Farm and traffic

2.1 Policy A26 allocating Blackwell Farm for urban development is entirely clear (under 'Requirements: Infrastructure' that "The principal vehicular access to the site will be via the existing or a realigned junction of the A31 and the Down Place access road, which will be signalised". This is impractical. It is also so costly as to be undeliverable. The highways works are also highly undesirable on environmental grounds, which are addressed in section 3 below.

Impracticality of access from the Hogs Back

2.2 Compton Parish Council commissioned RGP - Transport Planning and Infrastructure Design Consultants to advise on the transport and highway implications of the proposed Blackwell Farm development. This report is in draft and available from Karen Stevens. It demonstrates that there is insufficient space on the A31 to construct the minimum necessary road space and associated infrastructure to allow the proposed signalised junction to be built. At least 20m total highway width is required, but the existing highway is just 14m at this point due to the road being contained within the A31 overbridge structure. This could only be remedied by hugely expensive highways improvements on the top of the Hogs Back, including widening the A31 bridge over the A3 and acquiring and demolishing dwellings on the north side of the A31. These have been omitted from the estimate of costs for enabling the Blackwell Farm development to proceed.

2.3 The report also shows that the anticipated traffic volumes on the roads meeting at the top of the Hogs Back are easily sufficient to warrant the construction of a roundabout at this Guildford Borough Council has not proposed a roundabout, presumably because there is wholly insufficient space for this to be built, and there is a likelihood of significant danger to highways users from attempting to insert a roundabout in immediate proximity to the split-level A31/A3 junction. Whether a signalised junction could work remains unproven.

2.4 The road layout at the eastern end of the Hogs Back is the proposed access off the A31 into Blackwell Farm would be at the existing Down Place junction. This is a very small junction which would need major improvement
including left and right egress lanes onto the A31 which extend well back to absorb the substantial volume of vehicles expected to queue at the signalled junction. The road layout would need amendment to overcome the sharp dog-leg bend in Down Place close to the A31 junction. It is not certain that the existing bridge over the A31 exit slip-road (onto the A3 northbound) is wide enough given the need for bus, pedestrian and cycle access. There are also existing traffic restrictions in place to limit bridge loading.

2.5 Even if all these upgrades to the highways were achieved, the road layout would frustrate many drivers. First, modelling suggests (Surrey CC SINTRAM model - see RGP Figure 3.1) that two thirds of Blackwell Farm residents exiting Down Place onto the A31 in the morning peak would expect to turn left towards Guildford. The road is already heavily congested at this point at this time, so exit would be limited to a few vehicles that could find some exit space at each phase of the proposed traffic lights. There would be substantial queues back towards Blackwell Farm. Second, the road layout also seriously impedes access to or from the A3 north-east of the site around Guildford city centre. Drivers southbound on the A3 aiming at Blackwell Farm would take the A31 diverge to join the A31 westbound, but this would find themselves west of the Down Place junction to Blackwell Farm. Drivers would therefore be obliged either to effect a U-turn through a point in the central reservation of the A31 or continue to the Puttenham junction with the B3000 where they could turn around. Either would be frustrating and time-consuming. Both would be dangerous, as accident statistics presented by RGP demonstrate. Correspondingly, any drivers leaving Blackwell Farm from Down Place and aiming for the A3 northbound would similarly need to turn right and begin their journey by travelling in the wrong direction: they too would need to effect a U-turn through a point in the central reservation of the A31 or continue to the Puttenham junction with the B3000. Then they would return eastbound on the A31 joi ning the morning peak queue, and take the slip-road to the A3 under the new Down Place bridge in order to travel north on the A3. The numbers of vehicles needing to make these awkward manoeuvres would increase the danger to themselves and to other road users. The alternative would be turn left out of Down Place into queue of traffic during peak hours before cutting through residential streets in Onslow Village and joining the A3 at the Tesco roundabout.

2.6 There is no certainty that the third party land required for the highways improvements would be available: the Borough Council has not demonstrated that it will be. There has been no indication that Highways England would agree to the widening of the A31 overbridge.

Alternative access to Blackwell Farm from Guildford

2.7 Proposed Submission Policy A26 states that "Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue."

2.8 Without this access, the Blackwell Farm site would not be an urban extension but a free-standing urban development which happened to be located close to the edge of Guildford. The likely reason Guildford BC views this as a secondary access rather than the primary one is because it will be very difficult to achieve in a way which significantly increases highway capacity. The starting point for considering the Blackwell Farm site is that access into Guildford and to the A3 would all be via the 'Tesco' roundabout on Egerton Road, which is already highly congested. The Inspector's Report into the Guildford Borough Local Plan Review, in September 2001, reported on the (then) proposed development of Manor Park on Manor Farm:

"The principal access to the site from the A3 and the Stag Hill Campus is the roundabout immediately to the west of the A3 (the Tesco roundabout). This roundabout and other elements of the local road network are likely to be operating above their normal capacity before the development of Manor Farm is commenced" (paragraph 16.9.5). "...the Council and the highway authorities were satisfied that a sustainable solution to the movement implications of the [Manor Farm] Proposal could be found and that to this end the University would, and could, if need be in conjunction with the authorities, confine the increase in traffic generation from the Manor Farm site to no more than 5%..." (paragraph 16.9.7). "...it is implicit in the agreement that if the 5% ceiling can not be achieved, the scale of the development will also need to be limited" (paragraph 16.9.9).

With that development and much of the Manor Park scheme now implemented, the congestion locally is even worse. We are aware of no efforts to enforce a 5% limit on the increase in vehicles associated with University of Surrey development. Efforts to alleviate this congestion may help, but fundamentally the scale of congestion in the peak periods reflects problems across the local network. If capacity were to be created on the Tesco roundabout, the likelihood is that this would immediately be taken up by the generation of additional trips, currently frustrated.
2.9 Gill Avenue, which passes the Royal Surrey County Hospital and leads directly to Egerton Road, will be difficult to join to Blackwell Farm (to its west). This is because a road would need to follow an awkward route either north or south of the Ancient Woodlands of Strawberry Grove and Manor Copse which shield the whole of the western side of the Research. We strongly oppose any access through the Ancient Woodland as this would be environmentally entirely unacceptable. Road access north of the Ancient Woodland would funnel Blackwell Farm traffic through the Research Park. Road access south of the Manor Copse Ancient Woodland would funnel traffic through the Manor Park student village and ruin the setting of a Scheduled Ancient Monument (a moat at Manor Farm). It would also isolate newly constructed Veterinary School buildings from their paddocks. The road would therefore introduce pollution into a series of sensitive receptors (Ancient Woodland, the Veterinary School, student accommodation and horse paddocks) and pose a clear danger to students and other existing users of the area.

2.10 The problem appears to be that Guildford BC decided some years ago to allocate Blackwell Farm for development on the assumption that access problems could be resolved, but now finds that this is not practicable. The Issues and Options consultation in October 2013 proposed the site for urban development, but noted "There are however constraints in terms of access to the site from the A3, particularly given that where access would likely be required is in the AONB or very close to it. The site as a whole is very close to the AONB, which would require sensitive development and careful consideration." Following this, the Council tried to secure access direct from Guildford, via the 'Tesco' roundabout and Egerton Road. The heavy existing congestion on this side of Guildford turned out to make this problematic and little apparent progress has been made. Internal correspondence within Guildford BC on 12 June 2015 obtained only by Freedom of Information request illustrates this:

"Tesco Roundabout (Egerton Road/A3 northbound slips)

GBC has been developing a junction improvement scheme for Tesco roundabout which could offer a substantial capacity improvement and may significantly reduce peak hour queuing. The improvement is subject to funding and to the existing hotel access being closed to vehicular traffic with a new access from the Sports Park access road. The layout is also subject to Safety Audit and technical approval. However, we thought it would be beneficial to share this layout with you on a confidential basis so that you can be informed of the likely scale of improvement required.

The next stage is for GBC to discuss this layout in more detail with SCC in order to get some idea of the technical aspects of the proposal agreed. For your information, the layout has been presented at the Surrey CC/Guildford BC Joint Infrastructure Group meeting which is also attended by Highways England." (Email from [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], Transport Consultant (Policy) to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (Interim Head of Planning))

Little appears to have come of this initiative so far.

2.11 Meanwhile, Surrey County Council as Highways Authority is concerned about introducing additional traffic into this congested area from the A31. The extraordinary outcome of these difficulties is that the Proposed Submission Local Plan proposes the primary access for Blackwell Farm should be from the A31 at Down Place, whereas Surrey County Council has specifically advised that the primary access should be via Egerton Road.

2.12 Surrey County Council has advised a member of Save Hogs Back that a signalised junction at Down Place would not be adequate for the volume of traffic likely to want to use it, and has therefore been keen to discourage use of that access point. The methods proposed were making the route through Blackwell Farm tortuous and restricting access by means of Automatic Number Plate Recognition (ANPR). This is made clear in the exchange of correspondence between Karen Stevens (Save Hogs Back) and [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (Transport Development Planning Manager West, Surrey CC) (see email exchange 3-7 June 2016 'Re: Access to Blackwell The Surrey CC response was after consultation began on the Proposed Submission Plan, demonstrating the gulf in approach between the two arms of local government at this critical stage. Surrey CC advised that:
"were ANPR to be implemented, it could be on a private section that formed the ultimate short link between the new development and the existing UniS activities in West Guildford. This section of the route would therefore not be adopted. ANPR is used on motorways/other routes (including the A3 between Boundless Road and the A333 where it is in a tunnel) where there are average speed restrictions in place. Clearly these are not used to control access on the public highway, and I recognise that this would be a quantum leap to use this technology on the public highway for these purposes.

2.13 Surrey County Council's position now is that "All of the principles behind the access strategy would need to be justified through the production of a Transport Assessment, which.... would not come about until the planning application / pre-planning process " The effect of the impasse is therefore that Guildford BC is seeking to allocate a site which Surrey CC is far from certain of being capable of delivery, with the County Council requesting that matters be left for sorting out at the planning application stage. Guildford Borough Council has been unhelpful in addressing the concerns raised by Save Hogs Back, with a failure to answer emails properly or at all (see 'RE: Down Place junction {UNC}' 12-19 May 2016 and 'Fwd: Blackwell access' 23 June 2016) and no engagement in the access difficulties raised by their own proposals. Our experiences illustrate the reticence of the parties to accept the lack of feasibility of access to the Blackwell Farm site. In our view it would be irresponsible for the forwarding planning process to allocate Blackwell Farm without absolutely clear understandings of how access to it would be achieved, what the network effects would be, how congestion would be avoided, and who would pay for the necessary infrastructure. It is clear that there are currently no answers to these questions.

Through access between the A31 and west Guildford via Blackwell Farm

2.14 The Proposed Submission Plan is clear in Policy A26 that "A through vehicular link is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital. This will provide relief to the A31/A3 junction,in advance of the delivery of Highways England's A3 Guildford scheme." In other words, the intention is to attract additional traffic off the A31 and A3 through the Blackwell Farm site in a 'Sustainable Movement Corridor'. We consider there is nothing sustainable in a glorified rat-run.

2.15 Guildford Borough Council is explicitly trying to promote what Surrey County Council is trying to avoid. Given that both ends of the route have proved impractical just to meet the impacts of the Blackwell Farm development, we consider a further increase in their capacity is wholly unrealistic. This confusion is wholly We consider the Plan is unsound on the ground that it is not deliverable. In addition to the practicability, we notice that Policy A26 in the Plan expects the Blackwell Farm development to pay for this additional infrastructure for other users attracted to the area:"Developer to provide the western route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the western route section on the Local Road Network."

2.16 There are practical problems in putting a through route into position between Gill Avenue and the A31 at Down Place while serving the Blackwell Farm Connecting the 'Sustainable Movement Corridor' to Gill Road will be problematic. The routes noted in paragraph 2.9 above would be tortuous if north of the Ancient Woodland, while a link south of the Ancient Woodland would barely serve the Blackwell Farm development at all (which would all be to its north). Both routes would send through traffic to the hospital and elsewhere through residential areas (Blackwell Farm or Manor Park campus).

2.17 Not only are the access routes in the Proposed Submission Plan inadequate for the task, but Surrey County Council and Guildford Borough Council have played down the traffic volumes which will need to use them at peak periods:

- the data from SCC's Strategic Highways Assessment Report are the average for the morning peak three hours (not the average for the morning peak one hour, which would be 16% higher);
- no allowance has been made for the impacts of promoting a through vehicular link, but the SHAR is forced to acknowledge that, with this, "then flows through the development may be higher still" (paragraph 4.7.S).

The higher real traffic volumes in the peak may necessitate still larger works at the accesses, with associated practical problems and also additional costs.
2.18 The effect of these numerous deficiencies and confusions is that there is wholly insufficient evidence to
demonstrate that the access arrangements in the Proposed Submission Plan to and through the Blackwell Farm site are
actually deliverable. This is in breach of Government policy:

it is the intention in DfT Circular 02/2013 *The strategic road network and the delivery of sustainable development*
on capacity enhancements that "Capacity enhancements and infrastructure requirements to deliver strategic growth
should be identified at the Local Plan stage, which provides the best opportunity to consider development
aspirations alongside the associated strategic infrastructure needs."

Paragraph 158 of the NPPF similarly requires that "Each local planning authority should ensure that the Local Plan
is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics
and prospects of the area" (emphasis added).

The proposals have therefore failed to have adequate regard to national policies and advice. The Plan is unsound because
the proposal to develop land at Blackwell Farm would not be effective, as it is not deliverable over the Plan period due to
the impracticability of access.

**Cost of access to Blackwell Farm**

2.19 The transport costs of the proposed works to give access to Blackwell Farm have been understated in the
Proposed Submission Plan. Some of the costs are listed in Appendix C of the Plan. The need to resolve consequential
highways infrastructure requirements is identified in Policy A26 but not costed. Further requirements have been
identified by RGP but not costed. The table below lists the main transport-related items.

<table>
<thead>
<tr>
<th>Project</th>
<th>Delivery</th>
<th>Delivered by</th>
<th>Likely cost and funding source</th>
</tr>
</thead>
<tbody>
<tr>
<td>LNR3 New signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)</td>
<td>Between 2021 and 2027</td>
<td>Surrey County Council and/or developer</td>
<td>£Sm Developer funded</td>
</tr>
<tr>
<td>LNR4 Access road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)</td>
<td>Between 2021 and 2027</td>
<td>Surrey County Council and/or developer</td>
<td>£20m Developer funded</td>
</tr>
<tr>
<td>LNRS Interventions to address potential highway performance issues resulting from development at Blackwell Farm site</td>
<td>Between 2021 and 2033</td>
<td>Surrey County Council and/or Highways England and/or developer</td>
<td>£Sm Developer funded</td>
</tr>
<tr>
<td>SMC1 Sustainable Movement Corridor-West</td>
<td>Between 2018 and</td>
<td>Surrey County Council, Guildford</td>
<td>£20m Developer contributions and Local Growth Fund</td>
</tr>
<tr>
<td>Project</td>
<td>Description</td>
<td>Start Year</td>
<td>End Year</td>
</tr>
<tr>
<td>---------</td>
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<tr>
<td>NR2</td>
<td>New railstation at Guildford West (Park Barn)</td>
<td>Between 2018 and 2029</td>
<td>Network Rail, SCC, Royal Surrey County Hospital, GBC and developer(s)</td>
</tr>
<tr>
<td>A26</td>
<td>Interventions to address highway network performance issues which could otherwise result from the development</td>
<td>Not stated</td>
<td>Not stated</td>
</tr>
<tr>
<td>RGP</td>
<td>New or widened bridge over A3 on-slip</td>
<td>Omitted</td>
<td>Not stated</td>
</tr>
<tr>
<td>RGP</td>
<td>Widening Farnham Road A31 bridge over A3 (north side)</td>
<td>Omitted</td>
<td>Not stated</td>
</tr>
<tr>
<td>RGP</td>
<td>Acquisition of land on the north side of the A31 west of A3 overbridge</td>
<td>Omitted</td>
<td>Not stated</td>
</tr>
<tr>
<td>RGP</td>
<td>Road safety mitigation for vehicles on A31 reversing direction from west to east</td>
<td>Omitted</td>
<td>Not stated</td>
</tr>
<tr>
<td>RGP</td>
<td>Possible additional costs to raise capacity of Down Place/A31 junction to accommodate additional traffic volumes</td>
<td>Omitted</td>
<td>Not stated</td>
</tr>
</tbody>
</table>

2.20 The need for interventions to address highway network performance issues which could otherwise result from the development is especially acute in the case of Blackwell Farm. Surrey County Council's *Options Growth Scenarios Transport Assessment Report*, January 2014, (to some extent overtaken by the *Strategic Highway Assessment Report* in June 2016) explains the likely highways effects of the various major urban developments proposed by Guildford BC (though the size of the Blackwell Farm scheme has been reduced since then from 2,250 to 1,800 dwellings). Blackwell Farm was 'Scenario 3', the sum of Scenario 2 - development of all permitted sites and three large developments just beyond the Borough's boundaries - and the south-west Guildford urban development at Blackwell Farm itself. The Options study concluded that "When comparing scenarios 3 (south-west urban extension), 4 (north-east urban extension) and 5 (Wisley airfield development) to scenario 2, scenario 3 has the largest impact on general borough wide network statistics and scenario 4 the least" (paragraph 5.1.7). The 2016 SHAR did not conclude on the relative impacts of each major urban development.

2.21 The table above shows that the stated costs purely for access to the Blackwell Farm development (and associated through movement) amount to £60m. This is over £33,000 per dwelling. In addition, there would be very serious additional highways costs to resolve the consequences of Blackwell Farm in the wider network beyond the site and to achieve the junction improvements with signalised lights around the Down Place access. Those are just the transport costs.
costs attributable to the development; in addition, Policy A26 refers to other supporting infrastructure including a two-form entry primary school, local retail centre, GP surgery, open space, playing fields and allotments. Secondary education is only not mentioned because a secondary school at the nearby proposed urban development at Flexford/ Normandy is expected to serve the Blackwell Farm development. Furthermore, 40% of the dwellings built will need to be affordable (Policy H2), largely cross-subsidised from the private open market housing for sale. All the usual gas, water, electricity and sewerage services would be needed, and typical contributions to local government services. The transport-related costs alone are far more than a development of 1,800 houses and 31,000m² of employment could realistically bear. Together with all the other infrastructure necessary to allow a new community to proceed, the scheme is undeliverable financially.

2.22 We conclude that Policy A26 on Blackwell Farm is not legally compliant because it has failed to have adequate regard to the resources likely to be available for implementing the proposals in the document, in respect of the infrastructure requirements needed for the development to proceed; no regard at all has been had to a range of substantial impacts. The policy is also unsound because the proposal to develop land at Blackwell Farm would not be effective, as it is not deliverable over the Plan period due to very high infrastructure costs.

2.23 We recommend that the Blackwell Farm urban development proposal in Policy A26 is deleted on highways grounds.

Impact on the Surrey Hills AONB and landscape

Direct impact on the AONB

3.1 The proposed development at Blackwell Farm is the only major scheme in the Proposed Submission Plan which would directly affect the Surrey Hills. The built-up urban development is proposed in the setting of the AONB to the north of the Hogs Back, but the principal access road is proposed to cross the AONB in a highly intrusive manner, and the greatly expanded access at the A31/Down Place junction would also adversely affect the AONB.

3.2 The principal impact of the development within the AONB would be the construction of a major access road up and down the steep northern slope of the Hogs Back. The ridge of the AONB is at nearly 50m and the northern AONB boundary at 0m (on the contour through Down Place Stables, below the bend in the existing Down Place access road). The national landscape designation therefore includes the whole of the steepest part of the slope through a vertical elevation of 40 metres. A road on this slope at this point would be highly damaging to the AONB, and its construction would also have further very serious impacts.

3.3 The construction of 500m of major access road on the slope down from the AONB ridge is in our view major develop As such it must pass the tests in paragraph 116 of the NPPF if it is to be acceptable. We consider it fails to do this. The proposal at Blackwell Farm is not of such overriding importance that the access to it through the AONB meets the "exceptional circumstances" required, nor can it be demonstrated to be in the public interest in view of the adverse effects. The need for the main development is predicated on an Objectively Assessed Need for housing which we consider far too high. Whether or not the Secretary of State agrees with us (either that this is major development in the AONB or that the OAN is too high), the AONB is a key consideration in its own right. The NPPF makes clear at paragraph 14 that 'sustainable development' involves reflecting policies from the NPPF where these indicate that development should be restricted, and AONB is one such policy. There is no policy presumption that housing needs should override AONB interests: the reverse applies. In view of the damage which would be done to the AONB by the proposed allocation, and this being the only major allocation to do that, we consider that Blackwell Farm should be the primary candidate of all the major sites for deletion from the Plan.

3.4 The Proposed Submission Plan states as a requirement that "Primary vehicular access to the site allocation will be via the existing or realigned junction of the A31 and the Down Place access road, which will be signalised. The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV". The comment on the design of the road is as foolish as it is undeliverable. The existing access road is a beautiful country lane flanked by mature trees which is entirely typical of the AONB landscape. The first option, of improving this 'sympathetically' to the standards needed by an access road for a new settlement (let alone to provide a Sustainable Movement Corridor to serve the Research Park, Hospital and other facilities), is impossible. The road is too narrow to be widened sufficiently and has a sharp bend near the bottom. This option could only be effected by
the large scale removal of mature trees on one or both sides of the route, plus further damage on the lower slope to overcome the bend. Taking the substantial adjacent land beyond the paved highway itself, used in highway construction, would cause further major damage to the heavily treed landscape of the AONB in this location. This could not be 'sympathetic' to the AONB.

3.5 The second option, of a 'new adjacent parallel access road', would introduce an appalling scar onto the steep northern slope of the Hogs Back. It would irreparably damage this nationally known iconic landscape, and it is absurd for the Plan to suggest that this also could be designed 'sympathetically' to the AONB (and AGLV). An inevitable consequence of forcing a wide road down a steep slope at the angle proposed would be to require a near vertical wall of chalk on the ridge-side and other earthworks. This would be part of the unavoidable degradation to the AONB associated with the road, which will be visible and intrusive from miles around. There is also a real possibility that the access road would be accompanied by street lighting under either option, introducing a damaging night-time impact into this dark AONB landscape.

3.6 The Highways Authority has indicated to us that it will require street lighting at and around the new signalised junction on the top of the Hogs Back on the A31 in the vicinity of Down Place and Down. This would be damaging to the current night-time experience: lighting currently stops east of the A3/A31 interchange, with the A31 and the AONB to the west of this largely unlit. The change would give the clear impression that Guildford had spread outwards to the west and upwards to the highest point around the city.

3.7 The proposed road down the AONB scarp would damage views to the AONB from public rights of way to the north and north east as well as from Manor Park and from more distant viewpoints in and around the AONB. The construction of the road would itself greatly increase the damage to the experience of the AONB by introducing thousands of vehicle movements daily: this would force drivers and passengers to see and experience the visual damage done to this nationally important landscape, by the road they would be using.

3.8 In each of these respects, the proposed allocation at Blackwell Farm would run counter to the statement in the Plan's 'Spatial Vision' that 'Areas of high environmental value such as Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest will be retained and afforded great New development on the edges of urban areas will be required to treat the transition from urban to rural character in a sympathetic way.'

Impact on the setting of the AONB

3.9 The proposed urban development would be in the setting of the AONB to the north of the Hogs Back (and also north of but abutting the Area of Great Landscape Value). Only the access road to the A31 would be permitted on land to the south of this development. If, however, the secondary access road was aligned south of Manor Copse, then this too would pass through the AGLV.

3.10 Regard must be had to the setting of AONBs. Section 85(1) of the Countryside and Rights of Way Act 2000 states: "In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving or enhancing the natural beauty of the area of outstanding natural beauty" (emphasis added). The Government's Planning Practice Guidance draws attention to this obligation and specifically mentions proposals "which might have an impact on the setting of AONBs (Natural Environment paragraph reference ID 8-003-20140306). The setting of AONBs is not protected as rigorously as land within AONBs, but various appeal decisions before and since the NPPF - which have rejected intrusive developments in the settings of AONBs - show that it continues to be relevant to decisions. In the absence of policy guidance, the formal position is that the weight to be given to setting is a matter for the decision-taker's discretion. NPPF paragraph 115 requires that in any decision "great weight should be given to conserving landscape and scenic beauty" in AONBs. In the context of paragraph 85 of the Act noted above, this applies not only to developments proposed within an AONB but if proposed in its setting such that the AONB would be affected. This should be taken into account in plan preparation.

3.11 Both Guildford Borough Council's and Surrey County Council's Landscape Character Assessments (LCAs) identify the drama of the chalk ridge and the panoramic views, north and south, as defining characteristics of the Hogs Back. Both these LCAs also identify the significance of views to and from the ridge. The Guildford BC LCA Rural Urban Fringe Assessment of the Hogs Back references the importance of the land in providing "the setting to and views
from Guildford" and the desire to maintain the "essentially undeveloped rural character" of the land. The assessment notes that: "The setting of Guildford and the AONB are both highly sensitive to any small scale incremental change".

3.12 In the circumstances at Blackwell Farm, we would expect considerable weight to be given to protection of land from inappropriate change in the setting of the Surrey Hills AONB: this is the setting of the Hogs Back, a nationally known and revered part of an AONB; the steep slope to the north from the Hogs Back ridge opens up a wonderful vista which contributes enormously to the enjoyment of the AONB, and should be protected from inappropriate change; the setting has been relatively little-damaged to date (though development by the University of Surrey is creeping out of Guildford into it), and this achievement should be continued.

3.13 The proposed development would damage the setting of the AONB, causing Guildford to sprawl yet further into the rural vista that can be enjoyed from the AONB on the Hogs Back. We appreciate that urban built development is no longer proposed on land south of Down Place and Manor Farm (contrast the Issues & Options and Consultation Draft stages of the Plan), though there would continue to be visual intrusion into the AONB's setting. Moreover, the continued presence of the primary access road to the site passing through the immediate setting of the AONB (and the AONB itself) remains a very seriously damaging aspect of the proposal by bringing noise and pollution into the setting, as well as visual damage from the road and the eye-catching effect of moving vehicles upon it. Furthermore, the thousands of northbound users of the primary access road daily would themselves experience comprehensive views into the setting of the AONB; their appreciation of this setting would be significantly marred by the Blackwell Farm development. We conclude that the allocation would conflict with Policy PI: Surrey Hills Area of Outstanding Natural Beauty not least because it would fail "to conserve and/or enhance the setting and views of the AONB". The impact of the urban development allocation on the setting of the AONB is not considered in Policy A26 and has therefore been neglected in the Proposed Submission Plan.

The future boundary of the AONB

3.14 Natural England has announced its intention to review the boundary of the Surrey Hills AONB. It commissioned a report in 2012, from Alison Farmer Associates, which identified areas of search for possible extensions to the This included the whole of the Blackwell Farm allocation area. A further report was commissioned by Surrey County Council on behalf of the Surrey Planning Officers Association and the Surrey Hills AONB Board in 2013 from Hankinson Duckett Associates to further evaluate the natural beauty of those areas of search (and other Landscape Character Assessment work). This proposed extensions to the existing AONB boundary on the north side of the Hogs Back (and elsewhere), but just omitted the Blackwell Farm allocation area.

3.15 The Hankinson Duckett evaluation was not carried out in detail, so in 2016 Compton and Worplesdon Parish Councils commissioned another firm of landscape architects, Land Management Services (LMS), to undertake a more detailed natural beauty evaluation in the vicinity of Blackwell Farm, Down Place and Homestead Farm to the north of the Hogs Back. The LMS report (the final report is available from Karen Stevens) agreed that the area identified by Hankinson Duckett Associates should be included within a revised AONB boundary north of the Hogs Back, but also proposed a north-eastward extension of the AONB boundary to include Down Place and Blackwell Farm. No further land at Homestead Farm was proposed for inclusion.

3.16 The LMS evaluation identified small scale character areas, one of which covered the eastern-most parts of the study area, adjacent to the built-up area of There were two parcels: one on Manor Farm (south and east of Manor Copse Ancient Woodland) and one north of Strawberry Grove Ancient Woodland. The latter comprises the north-east corner of the Policy A26 development allocation at Blackwell Farm. LMS recommended that both these parcels should not be included within the revised AONB boundary, but recommended that they remain open as the setting of Guildford and the AONB. LMS concluded here: "This area does not merit inclusion within the AONB, but provides an important buffer and transitional landscape on the western edge of Guildford. It is recommended that the boundary to [the AONB here] follows the western edge of this sub character area but includes Strawberry and Manor Copses. The semi-rural transitional character of this landscape should be retained in order to conserve the currently limited impact of Guildford on the AONB and other rural land to the west."

3.17 We consider it vitally important that decisions on the Guildford Local Plan in the near future do not prejudice the outcome of the review of a nationally important landscape designation. The most detailed natural beauty evaluation north of the Hogs Back to date (against Natural England's criteria for designating AONBs) shows that most of the Policy A26
Blackwell Farm allocation area should be included within a revised AONB boundary. The principal remaining area, in the north-east corner of the allocation, should remain open as the setting of the AONB and of Guildford.

3.18 The Blackwell Farm allocation should therefore be withdrawn so that, with a high probability, most of the land can be included within the AONB in future after the boundary review has been completed. The LMS interpretation of natural beauty confirms our own local perception that the land identified does merit AONB designation. Its high landscape quality - in the setting of the current AONB - is a major consideration for the Local Plan in any event. This would be a highly damaging location for a major urban development in landscape terms.

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

Attached documents:
- Response to GBC_Reg19_cons_by_SaveHogsBack_CPRESurrey_Final_Redacted.pdf (875 KB)
- Appendix 3 - 2016-07-04 ISSUE.PDF (2.4 MB)
- Appendix 4 - Hogs Back Natural Beauty Evaluation V2 24.05.16 (1).pdf (6.0 MB)

Comment ID: PSLPS16/8005  Respondent: 8729217 / Karen Stevens  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Impact on the Surrey Hills AONB and landscape

Direct impact on the AONB

3.1 The proposed development at Blackwell Farm is the only major scheme in the Proposed Submission Plan which would directly affect the Surrey Hills AONB. The built-up urban development is proposed in the setting of the AONB to the north of the Hogs Back, but the principal access road is proposed to cross the AONB in a highly intrusive manner, and the greatly expanded access at the A31/Down Place junction would also adversely affect the AONB.

3.2 The principal impact of the development within the AONB would be the construction of a major access road up and down the steep northern slope of the Hogs Back. The ridge of the AONB is at nearly 150m and the northern AONB boundary in the area at 110m (on the contour through Down Place Stables, below the bend in the existing Down Place access road). The national landscape designation therefore includes the whole of the steepest part of the slope through a vertical elevation of 40 metres. A road on this slope at this point would be highly damaging to the AONB, and its construction would also have further very serious impacts.

3.3 The construction of 500m of major access road on the slope down from the AONB ridge is in our view major development. As such it must pass the tests in paragraph 116 of the NPPF if it is to be acceptable. We consider it fails to do this. The proposal at Blackwell Farm is not of such overriding importance that the access to it through the AONB meets the “exceptional circumstances” required, nor can it be demonstrated to be in the public interest in view of the adverse effects. The need for the main development is predicated on an Objectively Assessed Need for housing which we consider far too high. Whether or not the Secretary of State agrees with us (either that this is major development in the AONB or that the OAN is too high), the AONB is a key consideration in its own right. The NPPF makes clear at paragraph 14 that ‘sustainable development’ involves reflecting policies from the NPPF where these indicate that development should be restricted, and AONB is one such policy. There is no policy presumption that housing needs should override AONB interests: the reverse applies. In view of the damage which would be done to the AONB by the proposed allocation, and this being the only major allocation to do that, we consider that Blackwell Farm should be the primary candidate of all the major sites for deletion from the Plan.

3.4 The Proposed Submission Plan states as a requirement that “Primary vehicular access to the site allocation will be via the existing or realigned junction of the A31 and the Down Place access road, which will be signalised. The design of the
improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously
within the AONB and AGLV”. The comment on the design of the road is as foolish as it is undeliverable. The existing
access road is a beautiful country lane flanked by mature trees which is entirely typical of the AONB landscape. The first
option, of ‘improving’ this ‘sympathetically’ to the standards needed by an access road for a new settlement (let alone
to provide a Sustainable Movement Corridor to serve the Research Park, Hospital and other facilities), is impossible. The
road is too narrow to be widened sufficiently and has a sharp bend near the bottom. This option could only be effected
by the large scale removal of mature trees on one or both sides of the route, plus further damage on the lower slope to
overcome the bend. Taking the substantial adjacent land beyond the paved highway itself, used in highway construction,
would cause further major damage to the heavily treed landscape of the AONB in this location. This could not be
‘sympathetic’ to the AONB.

3.5 The second option, of a ‘new adjacent parallel access road’, would introduce an appalling scar onto the steep northern
slope of the Hogs Back. It would irreparably damage this nationally known iconic landscape, and it is absurd for the Plan
to suggest that this also could be designed ‘sympathetically’ to the AONB (and AGLV). An inevitable consequence of
forcing a wide road down a steep slope at the angle proposed would be to require a near-vertical wall of chalk on the
ridge-side and other earthworks. This would be part of the unavoidable degradation to the AONB associated with the
road, which will be visible and intrusive from miles around. There is also a real possibility that the access road would be
accompanied by street lighting under either option, introducing a damaging night-time impact into this dark AONB
landscape.

3.6 The Highways Authority has indicated to us that it will require street lighting at and around the new signalised
junction on the top of the Hogs Back on the A31 in the vicinity of Down Place and Down Lane. This would be damaging
to the current night-time experience: lighting currently stops east of the A3/A31 interchange, with the A31 and the
AONB to the west of this largely unlit. The change would give the clear impression that Guildford had spread outwards
to the west and upwards to the highest point around the city.

3.7 The proposed road down the AONB scarp would damage views to the AONB from public rights of way to the north
and north east as well as from Manor Park and from more distant viewpoints in and around the city. The construction of
the road would itself greatly increase the damage to the experience of the AONB by introducing thousands of vehicle
movements daily: this would force drivers and passengers to see and experience the visual damage done to this nationally
important landscape, by the road they would be using.

3.8 In each of these respects, the proposed allocation at Blackwell Farm would run counter to the statement in the Plan’s
‘Spatial Vision’ that “Areas of high environmental value such as Areas of Outstanding Natural Beauty and Sites of
Special Scientific Interest will be retained and afforded great protection. New development on the edges of urban areas
will be required to treat the transition from urban to rural character in a sympathetic way.”

Impact on the setting of the AONB

3.9 The proposed urban development would be in the setting of the AONB to the north of the Hogs Back (and also north
of but abutting the Area of Great Landscape Value). Only the access road to the A31 would be permitted on land to the
south of this development. If, however, the secondary access road was aligned south of Manor Copse, then this too
would pass through the AGLV.

3.10 Regard must be had to the setting of AONBs. Section 85(1) of the Countryside and Rights of Way Act 2000 states:
“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty,
a relevant authority shall have regard to the purpose of conserving or enhancing the natural beauty of the area of
outstanding natural beauty” (emphasis added). The Government’s Planning Practice Guidance draws attention to this
obligation and specifically mentions proposals “which might have an impact on the setting of” AONBs (Natural
Environment paragraph reference ID 8-003-20140306). The setting of AONBs is not protected as rigorously as land
within AONBs, but various appeal decisions before and since the NPPF – which have rejected intrusive developments in
the settings of AONBs – show that it continues to be relevant to decisions. In the absence of policy guidance, the formal
position is that the weight to be given to setting is a matter for the decision-taker’s discretion. NPPF paragraph 115
requires that in any decision “great weight should be given to conserving landscape and scenic beauty” in AONBs. In the
context of paragraph 85 of the Act noted above, this applies not only to developments proposed within an AONB but if
proposed in its setting such that the AONB would be affected. This should be taken into account in plan preparation.
3.11 Both Guildford Borough Council’s and Surrey County Council’s Landscape Character Assessments (LCAs) identify the drama of the chalk ridge and the panoramic views, north and south, as defining characteristics of the Hog’s Back. Both these LCAs also identify the significance of views to and from the ridge. The Guildford BC LCA Rural Urban Fringe Assessment of the Hogs Back references the importance of the land in providing “the setting to and views from Guildford” and the desire to maintain the “essentially undeveloped rural character” of the land. The assessment notes that: “The setting of Guildford and the AONB are both highly sensitive to any small scale incremental change”.

3.12 In the circumstances at Blackwell Farm, we would expect considerable weight to be given to protection of land from inappropriate change in the setting of the Surrey Hills AONB:

- this is the setting of the Hogs Back, a nationally known and revered part of an AONB;
- the steep slope to the north from the Hogs Back ridge opens up a wonderful vista which contributes enormously to the enjoyment of the AONB, and should be protected from inappropriate change;
- the setting has been relatively little-damaged to date (though development by the University of Surrey is creeping out of Guildford into it), and this achievement should be continued.

3.13 The proposed development would damage the setting of the AONB, causing Guildford to sprawl yet further into the rural vista that can be enjoyed from the AONB on the Hogs Back. We appreciate that urban built development is no longer proposed on land south of Down Place and Manor Farm (contrast the Issues & Options and Consultation Draft stages of the Plan), though there would continue to be visual intrusion into the AONB’s setting. Moreover, the continued presence of the primary access road to the site passing through the immediate setting of the AONB (and the AONB itself) remains a very seriously damaging aspect of the proposal by bringing noise and pollution into the setting, as well as visual damage from the road and the eye-catching effect of moving vehicles upon it. Furthermore, the thousands of northbound users of the primary access road daily would themselves experience comprehensive views into the setting of the AONB; their appreciation of this setting would be significantly marred by the Blackwell Farm development. We conclude that the allocation would conflict with Policy P1 Surrey Hills Area of Outstanding Natural Beauty not least because it would fail “to conserve and/or enhance the setting and views of the AONB”. The impact of the urban development allocation on the setting of the AONB is not considered in Policy A26 and has therefore been neglected in the Proposed Submission Plan.

The future boundary of the AONB

3.14 Natural England has announced its intention to review the boundary of the Surrey Hills AONB. It commissioned a report in 2012, from Alison Farmer Associates, which identified areas of search for possible extensions to the AONB. This included the whole of the Blackwell Farm allocation area. A further report was commissioned by Surrey County Council on behalf of the Surrey Planning Officers Association and the Surrey Hills AONB Board in 2013 from Hankinson Duckett Associates to further evaluate the natural beauty of those areas of search (and other Landscape Character Assessment work). This proposed extensions to the existing AONB boundary on the north side of the Hogs Back (and elsewhere), but just omitted the Blackwell Farm allocation area.

3.15 The Hankinson Duckett evaluation was not carried out in detail, so in 2016 Compton and Worplesdon Parish Councils commissioned another firm of landscape architects, Land Management Services (LMS), to undertake a more detailed natural beauty evaluation in the vicinity of Blackwell Farm, Down Place and Homestead Farm to the north of the Hogs Back. The LMS report (Appendix 4) agreed that the area identified by Hankinson Duckett Associates should be included within a revised AONB boundary north of the Hogs Back, but also proposed a north-eastward extension of the AONB boundary to include Down Place and Blackwell Farm. No further land at Homestead Farm was proposed for inclusion.

3.16 The LMS evaluation identified small scale character areas, one of which covered the eastern-most parts of the study area, adjacent to the built-up area of Guildford. There were two parcels: one on Manor Farm (south and east of Manor Copse Ancient Woodland) and one north of Strawberry Grove Ancient Woodland. The latter comprises the north-east corner of the Policy A26 development allocation at Blackwell Farm. LMS recommended that both these parcels should not be included within the revised AONB boundary, but recommended that they remain open as the setting of Guildford and the AONB. LMS concluded here: “This area does not merit inclusion within the AONB, but provides an important buffer and transitional landscape on the western edge of Guildford. It is recommended that the boundary to [the AONB here] follows the western edge of this sub character area but includes Strawberry and Manor Copses. The semi-rural...
transitional character of this landscape should be retained in order to conserve the currently limited impact of Guildford on the AONB and other rural land to the west.”

3.17 We consider it vitally important that decisions on the Guildford Local Plan in the near future do not prejudice the outcome of the review of a nationally important landscape designation. The most detailed natural beauty evaluation north of the Hogs Back to date (against Natural England’s criteria for designating AONBs) shows that most of the Policy A26 Blackwell Farm allocation area should be included within a revised AONB boundary. The principal remaining area, in the north-east corner of the allocation, should remain open as the setting of the AONB and of Guildford.

3.18 The Blackwell Farm allocation should therefore be withdrawn so that, with a high probability, most of the land can be included within the AONB in future after the boundary review has been completed. The LMS interpretation of natural beauty confirms our own local perception that the land identified does merit AONB designation. Its high landscape quality – in the setting of the current AONB – is a major consideration for the Local Plan in any event. This would be a highly damaging location for a major urban development in landscape terms.

Conclusions

3.19 We consider that the Blackwell Farm development allocation should be removed by deleting Policy A26 because of its impact on the AONB:

- there would be a significant direct impact of the primary access road on the AONB;
- the primary access road through the AONB would be major development in its own right, and the proposals do not fulfil the criteria for allowing such development;
- the proposed built development and part of the primary access road would have a significant adverse effect on the setting of the AONB;
- the signalled junction to the primary access road, where Down Place joins the A31 on the top of the Hogs Back, would be lit at night, which would damage the appreciation of the rural qualities of the AONB at night and emphasise the sprawl of Guildford into it;
- the primary access road from the Blackwell Farm development to the Hogs Back ridge would probably be lit at night, which would also damage the appreciation of the rural qualities of the AONB and emphasise the sprawl of Guildford into it;
- most of the proposed development site should be included within a revised boundary of the Surrey Hills AONB, while its north-east corner (north of Strawberry Grove Ancient Woodland) would be in the immediate setting of the AONB and should be kept free of development as a buffer between urban Guildford (the research park) and the AONB.

3.20 We conclude that the Plan is unsound because the proposal to promote development at Blackwell Farm in the Surrey Hills Area of Outstanding Natural Beauty and within its setting is not consistent with Government policy. Insufficient regard has been had to the impact of the primary access road on the AONB (and which we also regard as major development). Insufficient regard has also been had to the primary access road on the setting of the AONB none at all to the impact of the urban development area on the setting of the AONB. In that last respect we consider there has been a legal failure to comply with the Planning and Compulsory Purchase Act 2004, s19(2)(a).

Green Belt at Blackwell Farm

4.1 Paragraph 83 of the NPPF states that “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.” This is a continuation in principle of previous Green Belt policy (from PPG2, paragraph 2.9).

4.2 In the most recent review of the Guildford Local Plan, following the report of the Inspector in September 2001, there was just one change to the Green Belt boundary. This was to allow the expansion of the University of Surrey (and two minor adjacent plots) into Manor Farm (the Manor Park development). It is a further withdrawal of the Green Belt boundary to allow more development immediately beyond the last land release that is proposed now. The Local Plan Inspector in 2001 was alert to the risk of nibbling away at the Green Belt and responded as follows to objectors who
sought a more limited release of land from the Green Belt: “the guidance suggests that in reviewing Green Belt boundaries a longer time scale should be used than for other aspects of the Plan. If the normal period suggested for a local plan is ten years, it is not unreasonable to look at defining the Green Belt boundary with two local plan periods in mind. A cushion of undesignated land for future requirements, where they are reasonably foreseeable, can be accepted where it can avoid a succession of bites at the Green Belt” (paragraph 16.4.3).

4.3 The Borough Council and the University of Surrey are attempting to undermine this intention. The Local Plan was adopted in 2003, yet even when the Issues and Options report for the current Local Plan was issued in 2013, they were trying to release further land from the Green Belt in precisely the way the Inspector had been trying to prevent. Save Hogs Back and CPRE Surrey are appalled at this attempt to abuse and undermine Green Belt policy and principles. The proposal reflects a remarkably casual approach to the Green Belt which should not be tolerated. Further removal of land from the Green Belt at a location where Green Belt land has only recently been released is contrary to the expectations of Government planning policy and the Plan therefore unsound.

4.4 There should be no illusion about the University of Surrey’s desire to develop a huge swathe of land west of Manor Park at the foot of the Hogs Back. In November 2013 the University released its proposals for a ‘Garden Neighbourhood’ stretching as far west as Flexford House and occupying the whole area between the AONB and the railway beside Wood Street Village. An illustrative page from the proposals is attached as Appendix 1. This shows comprehensive development of the area, a new junction on the A31 and a road straight down the steep northern slope of the Hogs Back. The development of Blackwell Farm would only be a stepping stone in this expansionist thinking of the University which shows a serious lack of appreciation of the role of Green Belt, the Hogs Back and the Surrey Hills AONB. Releasing Blackwell Farm is highly undesirable in its own terms and would only fuel the desire of the University to press the Council for yet more land releases in future.

4.5 The Proposed Submission Local Plan has adopted “a controlled realignment of the Green Belt boundary and development of a small number of strategic sites, which will allow us to provide for mixed and inclusive communities supported by new infrastructure” (paragraph 2.28). The Plan is a coy as it possibly can be about the remarkable scale of Green Belt land release for housing which it proposes. Large urban developments are proposed in the Green Belt at Blackwell Farm (1,800 houses), Gosden Hill Farm (2,000 houses), former Wisley Airfield (2,000 houses) and between Normandy and Flexford (1,100 houses). Various Green Belt sites offering over 100 houses each are also proposed.

4.6 The Government policy on Green Belt in the NPPF begins with a statement of great clarity, but one which the Proposed Submission Plan appears to have neglected or sidelined: “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (paragraph 79). The NPPF does of course also provide considerable encouragement to the provision of the housing which the nation needs. It explains how the conflict is to be dealt with between the pressure of housing and the constraint of Green Belt (and other nationally important designations) at paragraph 14: “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless…. specific policies in this Framework indicate development should be restricted”. One such policy (footnote 9) is Green Belt.

4.7 For the avoidance of doubt, the Government has issued various statements confirming its commitment to Green Belt and reiterating how the pressure to release Green Belt land should be addressed in Local Plans. For example, Brandon Lewis MP, Minister for Housing and Planning told a Westminster Hall debate on 15 March 2016:

“…we have regularly made the point that the green belt is a legitimate constraint. It is an important part of the country’s infrastructure and the Government attach the highest importance to its protection. In fact, over the past few years we have increased it. The NPPF makes it clear that green belt boundaries should be established in local plans and can be altered only in exceptional circumstances, using the local plan’s process of consultation and independent examination. The Government do not specify what constitutes exceptional circumstances, as it is for each local authority to determine that and how much weight to attach to those circumstances” (Hansard column 307WH).

On 11 January 2016 Mr Lewis gave a written answer to a Parliamentary Question by Mr Laurence Robertson MP (Tewkesbury), as follows:
Green Belt
Question 21089
To ask the Secretary of State for Communities and Local Government, what his policy is on the priority that should be given to maintaining Green Belt land in Local Plans in areas where there is unmet housing need.

Answer Green Belt is protected by local authorities in line with national policy set out in the National Planning Policy Framework. The Framework states that permanence is an essential characteristic of Green Belt, and that a Green Belt boundary may be altered only in exceptional circumstances, using the Local Plan. Our supporting Guidance reminds local authorities that, in planning to meet their objectively assessed local housing needs, they must have due regard to national policies (including Green Belt policy) which indicate that development should be restricted and which may restrain the ability of an authority to meet all its needs. This applies even where there is no up-to-date Plan. It is for the Planning Inspector examining a revised Local Plan to determine whether it is based on sound evidence and in line with national policy.

A statement to Planning from DCLG reported on 25th April (attached as Appendix 2) said:

“There are no plans or policy to relax the strong protections that prevent inappropriate development on the green belt. Ministers have repeatedly been clear that demand for housing alone will not justify changing green belt boundaries.”

4.8 In our view, the statements from the Government clarify that releasing land from the Green Belt to meet housing needs is an option but is only to be undertaken in exceptional circumstances rather than lightly. Guildford Borough Council, in contrast, has chosen to meet all its Objectively Assessed Need for housing, taking whatever land is necessary from the Green Belt to secure this. Furthermore, the Proposed Submission Plan has made no real effort at all to justify the release of land from the Green Belt in the terms set by the NPPF. Paragraph 4.3.16 of the Plan simply states:

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

Claiming ‘exceptional circumstances’ is easy. However, there is no review of the arguments needed to demonstrate that exceptional circumstances might apply at any location in the Borough. In our view, this means that the Plan is unsound by virtue of not being consistent with Government policy, and also unlawful because it has failed to have regard to national policies and advice on Green Belt contained in guidance issued by the Secretary of State.

4.9 The purposes of Green Belt have played remarkably little part in the selection of areas for urban development in the Proposed Submission Plan. Pegasus Group for the Borough Council divided all non-urban land in the Borough into a series of large plots for analysis. Their most up-to-date analysis is given in their Green Belt and Countryside Study, Volume II Addendum Appendix 1, April 2014. This assumes that the Green Belt purpose of encouraging urban land recycling applies equally to all plots, but the other four purposes are assessed for each plot. If none or one purpose is served by the plot it is ranked as low sensitivity, two purposes are ranked as medium sensitivity and three or four purposes is ranked as high sensitivity. 41 plots in the Green Belt are identified as having low sensitivity, 67 as having medium sensitivity and 91 as having high sensitivity. Of the four major proposed urban developments noted in paragraph 4.1 above, three have medium sensitivity and one (Flexford/Normandy) has high sensitivity. It is striking that none of the plots having low sensitivity was chosen for development. The choice of sites for development was clearly not significantly influenced by suitability of sites in Green Belt terms.

4.10 Pegasus Group explains its approach to recommending ‘Potential Development Areas’ (PDAs) in its Volume II Addendum at paragraph 3.7:

“Volume II of the Study has focussed upon those parcels which directly adjoin the urban edge as they are likely to offer a more appropriate relationship with the main urban area than those parcels which are separate from it. It is recognised that if the Council do identify urban edge parcels as appropriate for development and removal from the Green Belt, this may offer the potential for some adjoining land parcels which do not currently connect with the urban edge to come forward in a more appropriate manner. However, such decisions will be best informed by the Council’s chosen spatial strategy, and choices upon the recommended PDAs around the urban edge set out in Volume II and this Addendum.”
In practice, the Borough Council did not accept this approach: two of the four main areas proposed for major development are essentially free-standing urban areas in the countryside, at Wisley Airfield and Flexford/Normandy. If these sites were considered suitable by the Council, then it should also have revisited the 41 plots previously identified as low sensitivity in Green Belt terms before deciding which to allocate.

4.11 We are not arguing that the choice of major development sites was random, but that Green Belt policy played hardly any part in the selection process. On not a single occasion is a Green Belt plot retained free of development ‘because it significantly fulfils Green Belt purposes’. Nor is a Green Belt plot proposed for release ‘because it has little benefit in fulfilling Green Belt purposes’. We consider that the Borough Council has fallen far short of being able to demonstrate exceptional circumstances to justify any of its choices of major development area in Green Belt terms. That is a major failure of policy implementation and, in our view, makes the selection of sites unsound as (i) contrary to national planning policy and (ii) not the most appropriate strategy when considered against its reasonable alternatives.

4.12 In reality, Pegasus Group has emphasised a range of non-Green Belt planning issues which it considers important, including a highly selective ‘sustainability assessment scoring’ system which is dominated by walking distances. No doubt informed by this, there are important deficiencies in the Borough Council’s approach when considering the possibility of releasing Blackwell Farm for development. Policy A26 refers to ‘key considerations’ merely as “AONB, AGLV, Access, Surface water flood risk”. There is much else at stake, and no justification for changing the existing Green Belt boundary to the newly proposed one.

(i) The protection of Ancient Woodland has been given little attention by Pegasus Group or the Council. Although there is no formal proposal to fell Ancient Woodland at Blackwell Farm, the presence of Strawberry Grove, Manor Copse and Wildfield Copse immediately adjacent to the proposed development area will compromise these irreplaceable natural assets as the residents of 1,800 houses seek nearby leisure and recreation. It appears that zero weight has been given to the real impact on Ancient Woodlands and ancient hedgerows. The proposed allocation can be expected to cause the degradation of the Ancient Woodlands to the extent that over a period of time they lose much of their biological and historic interest.

(ii) The Pegasus Group study refers to development within landscape designations but omits review of the impact of development on the setting of the Surrey Hills AONB. This is a major omission which we have attempted to rectify in paragraphs 3.9-13 above. Reference is made to landscape character but not to visual impact: the latter is an important consideration in close proximity to the Hogs Back and therefore an important omission in relation to Blackwell Farm.

(iii) The Pegasus Group study assumed that Purpose 5 of the Green Belt “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” (NPPF paragraph 80) applied equally everywhere. We think not. The Blackwell Farm site is capable of achieving far more by way of concentration of land uses than most other sites. This is because the whole of the Blackwell Farm site is owned by the University of Surrey, as is all the land to the east. One effect of stopping development on Blackwell Farm would be to oblige the University to pay more attention to the efficient use of its land. At present the University takes a relaxed approach to land supply:

- the University has devoted large areas to inefficient surface-level car parks (view this on Google Earth, for example);
- the Research Park is specifically advertised as a ‘low density rural location’ (see the video spool on www.surrey-research-park.com/), and provides just 65,000m2 of office space across 28.33 hectares;
- the Guildford Local Plan Inspector’s Report in 2001 agreed to remove over 60 hectares of land from the Green Belt at Manor Park for University purposes, immediately east of Blackwell Farm, which has given the University an impression that land supply is not an issue; the Inspector commented “It may be that, as many Objectors felt, the Proposal is being overgenerous in the amount of land that is being taken out of the Green Belt and that this could be cut back. I have sympathy with that view” – though he still released the land for the reasons he gave in paragraph 16.10.2.

(iv) There is no Green Belt boundary available on Blackwell Farm which would be reliably permanent. The NPPF states that when Local Plans review Green Belt boundaries local planning authorities should “define boundaries clearly, using physical features which are readily recognisable and likely to be permanent” (paragraph 85). The Council’s proposed western boundary to the site – the new Green Belt boundary – would follow a hedge in a dip in the landscape. The
existing Green Belt boundary is superior and there is a clear risk from the proposals that Guildford could in future sprawl further west of Blackwell Farm on the basis that the boundary proposed now is indefensible.

4.13 On all these grounds the existing Green Belt boundary has superior merit to the one now proposed further west.

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

Attached documents:

- Appendix 3 - 2016-07-04 ISSUE.PDF (2.4 MB)
- Response to GBC Reg19 cons by SaveHogsBack & CPRESurrey Final.pdf (900 KB)
- Appendix 4 - Hogs Back Natural Beauty Evaluation V2 24.05.16 (1).pdf (6.0 MB)
- Re_Access to Blackwell Farm.eml (30 KB)
- Re_Down Place junction [UNC].eml (24 KB)
- Fwd_Blackwell access.eml (9 KB)
- EIR request - ID 3035.pdf (516 KB)

Comment ID: PSLPS16/8063  Respondent: 8729217 / Karen Stevens  Agent:

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

Introduction

I object to Blackwell Farm (site allocation A26) being removed from the green belt and put forward as a Potential Development Area (PDA). I do not believe that the decision is justifiable or sound for three key reasons:

1. Inclusion of the site does not comply with national government policy on the adjustment of green belt boundaries. Furthermore there has been no proper review of this site and other sites across the borough in terms of their suit-ability for development from a green belt point of view. The Green Belt and Countryside Study by Pegasus is a flawed document, and in any case does not appear to have informed Guild-ford Borough Council’s selection of PDAs.

2. Inclusion of the site does not follow national government policy on development within Areas of Outstanding Natural Beauty (AONB) or national planning guidelines for the setting to AONBs. No exceptional circumstances have been put forward which demonstrate that the benefits of developing Blackwell Farm outweigh the harm to the AONB/AONB setting as is required by the NPPF for major developments (Section 11; Para 115-116).

3. The proposed vehicular access to the site is not viable, which means that the site is not “de-velopable”, it is not in a “suitable location for housing development” and there is no “reason-able prospect that the site is available and could be viably developed at the point envisaged” as is required by the NPPF (Section 6; para 47).

I fully support the detailed joint submission by Save Hog’s Back and CPRE Surrey which outlines objections on the grounds of legal compliance and soundness. In this, my personal response, I outline further reasons for my objection under the head-ings of Green Belt, AONB and Viability.

Green Belt Background

The proposed Blackwell Farm development is described in the draft Local Plan as an “urban extension”, and its location is described as “Guildford urban area”, both these descriptions are misleading and inaccurate (and are likely to skew public responses to the consultation). Blackwell Farm is in a rural location, completely dislocated from the town both geographically and in terms of its infrastruc-ture.
If you look at a map of the proposed development area, only the very far north-eastern corner of the site comes anywhere close to an urban area (Park Barn) and this is separated from it by a railway line and a belt of trees. The eastern edge is separated from the Surrey Research Park/University campus by ancient woodland and by an area of safeguarded agricultural land. The single row of houses at Beechcroft Drive at the southern end of Strawberry Meadow is part of Onslow Garden Village – not itself an “urban” area. Building a second “garden village” or “garden neighbourhood” within a few miles of an existing separated by an area of green belt and ancient wood-land would appear to make the term “urban extension” nonsense. Separating two “garden villages” by an area of green belt and an area of ancient woodland, would also effectively make this become an island within the urban area and would be gradually eroded by urban influence - just as has happened with the vet school being recently built on an area set aside as a buffer zone on the eastern side of Manor copse. The large areas of farmland within this green belt “island”, will be made redundant, just as the grade 2 farmland on Manor Park was made redundant in 2004 (and is now being levelled at the southern boundary to form new playing fields).

In terms of infrastructure too, Blackwell Farm is com-pletely disconnected from the town and cannot be inte-grated into the existing urban fabric. There are no existing public roads or sewerage systems or gas pipes connect-ing the site to the town, which brings into question the economic viability and the deliverability of the proposals. This site could be anywhere outside the urban boundary of Guildford and should be treated as such within the Local Plan.

Satellite image shows that the site is dislocated from the rest of Guild-ford and therefore doesn’t form a true urban extension as claimed. Should the site connect through by road to the Tesco roundabout then there would be transport chaos rendering the proposals impractical and the plan unsound.

**Openness and permanence of the green belt**

Blackwell Farm lies entirely within the green belt and the pro-posal to develop this site overlooks the two fundamental prin-ciples of the green belt: its openness and permanence (NPPF Section 9, Para 79).

**Openness**

The central objective of Green Belt is to protect the openness of land. Blackwell Farm is very open, not concealed discernibly from any direction, except perhaps from behind the railway to the north, and is visible from surrounding areas – notably from the Hog’s Back ridge to the west and to the east (at the Mount – a popular public recreation area). The site therefore performs a significant function in keeping land open.

**Permanence**

Green belt boundaries should be realigned with regard to their permanence. The boundary on this western side of Guildford was moved at the last local plan and to move it again would not be in line with the NPPF (Section 9, para 83).

Following the Public Inquiry into the 2003 Local Plan, the green belt boundary at Manor Farm was rolled back to allow the University of Surrey’s ex-pansion. A sizable area (63.3 hectares) was removed from the green belt and the new boundary (the belt of ancient woodland at Manor Copse and Strawber-ry Grove) was seen to be “a logical and defensible boundary well related to physical features on the ground and the land form, and it provides for the University’s long term requirements thereby avoiding pressure for further green belt releases in the future.” [Simon Birch, Director of Environmental and Plan-ning Services for Guildford Borough Council, in his evidence to the Public Local Enquiry, para 16.]

The Planning Inspector’s report at the time con-firmed this and made clear that this boundary review was for the long term (beyond the plan period):

“As to the Green Belt, the guidance suggests that in reviewing Green Belt boundaries a longer time scale should be used than for other aspects of the Plan. If the normal period suggested for a local plan is ten years, it is not unreasonable to look at defining the Green Belt boundary with two local plan periods in mind. A cushion of un-designated land for future requirements, where they are reasonably foreseeable, can be accepted where it would avoid a succession of bites at the Green Belt.” (16.4.3.)

A firm and justified boundary was therefore laid down with a firm statement that it would not be moved again. This substantially reinforces the NPPF ruling that boundaries need to be defensible and permanent [NPPF 9. 85]
Furthermore, the University accepted this:

“The CPRE rightly quotes ... that ‘there should be a presumption against frequent changes affecting the approved Green Belt.

“UniS does not advocate ‘frequent changes’ and fully supports the Borough Council’s proposal in 99U1 to exclude all of the land it requires for its long term expansion. [Tim Hancock, of Terence O’Rourke plc for the University (2.9 of his Supplementary proof in response to CPRE].

Of all the Green Belt boundaries in Guildford, this one at Manor/Blackwell Farm is unique in having been altered in 2003 after lengthy and detailed examination over two local plan periods. The boundary selected in 2003 was recognised to be defensible – it followed a belt of ancient woodland and a prominent field boundary/ancient hedgerow. It also follows the deer leap, which bounded the 12th century Royal Hunting Ground and has formed the boundary to Guildford since medieval times. This existing boundary, is on raised ground and so provides a natural screen to Guildford town. The new boundary being proposed – a hedgerow further west – lies within a dip. It is therefore not at all defensible and would provide no screening; the development would be clearly visible for miles along the Hog’s Back ridge, blighting views from the AONB. Furthermore, the arbitrary nature of this new boundary means there is a clear risk from the proposals of sprawl further west.

The statements made in 2003 about the permanence of the new boundary have been completely ignored by GBC. This is unacceptable and cannot be passed off as new circumstances or previously unforeseeable needs now arising. It is clear that the University has been developing its own plans as if the green belt was not an impediment to its expansion aspirations, contrary to the commitments it gave at the time. Furthermore, its own proposals for future development west of Blackwell Farm at Chalk Pit and Wildfield Farms show quite clearly its casual approach to the impediment of green belt.

Urban sprawl on the western edge of Guildford

Over the last 100 years, extensive development on the west side of Guildford on the northern slopes of the Hog’s Back has made a large impact on the character of this area from what was formerly farmland and parkland. The planned low-density garden village “Onslow Garden Village” (now known as “Onslow Village”) on the site of the medieval Royal Hunting Park was started in the 1920s. The building of the A3 Guildford and Godalming Bypass, which opened to traffic in June 1934, effectively formed the western extent of this development for many years. (Mount Farm, on the higher slopes of the Hog’s Back above Onslow Village was separately acquired to protect the views of the ridge, which formed the southern bound to development.)

Piecemeal development had taken place on the western side of the A3 following the gift of land to the UniS, with the construction of the Royal Surrey Hospital and then the Holiday Inn Hotel alongside the A3 on land that was leased by the University to help finance the construction of the low-density Research Park, which began in the 1980s on the lower slopes.

The Manor Park campus and sports park were given permission in 2003, which was followed by the recently built surface car parks of the Onslow Park and Ride. This low-density expansion of Guildford is bounded on the west by the ancient woodlands at Manor Copse, Strawbery-ry Grove and Dean Bottom. The 90m contour also forms the extent of the Manor Park development, which helps form a boundary to development and goes some way to protecting the rural views from the AONB and Blackwell Farm.

A further low-density expansion of Guildford, which “leapfrogs” the ancient woodland and rises above the 90m contour, as now proposed, would be an example of urban sprawl on a massive scale - rather than what is described as “urban extension” in the draft local plan.

Blackwell Farm meets 4 out of 5 purposes of green belt

The Green Belt and Countryside Study carried out by Pegasus is unsound and cannot be relied on as evidence. Although the worst aspects of it were rectified after a Guildford BC Scrutiny Committee meeting with public inputs, it is still a flawed document and does not address the problems highlighted in the report submitted by Tom Stevens, The purpose of Green Belt – Blackwell Farm, in September 2014 in response to the draft Local Plan (see Annex 1). A key problem with the revised Pegasus study is its “green belt sensitivity test”. It amounts to nothing more than a ‘tick-box’ exercise to see how many of the green belt purposes a particular site meets. No consideration is given to how effectively the site meets....
each function, and no weight is given to any one function above another. In the case of Blackwell Farm, the scoring was incorrect as the site meets all five green belt purposes, and yet is only considered by the Pegasus test to have met three.

**Green Belt**

- Purpose 1 - to check the unrestricted sprawl of large built-up areas
- Purpose 2 - to prevent neighbouring towns merging into one another
- Purpose 3 - to assist with safeguarding the countryside from encroachment
- Purpose 4 - to preserve the setting and special character of historic towns
- Purpose 5 - assist in urban regeneration, by encouraging the recycling of derelict or other urban land

(Please note that the purposes of Green Belt in this paper have been referred to, and numbered, according to the order they appear in within the NPPF, rather than the numbering adopted by Pegasus.)

**Green belt purposes:**

**Purpose 1.** The Blackwell Farm site fulfils the purpose of “checking the unrestricted sprawl of a large urban area” (Clearly the Metropolitan Green Belt refers to the sprawl of London, but the sprawl of Guildford is a significant consideration within that designated area.) Because Blackwell Farm is in the front line of Guildford’s sprawl, it is achieving this purpose very strongly. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings (265 hectares), stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. The green belt was created to protect this kind of sprawl (ie to prevent Guildford from moving ever westward) and should be allowed to do its job, rather than cave in at the first opportunity to the pressure it was designed to resist.

**Purpose 2.** To prevent neighbouring towns merging into one another

The Pegasus study considered the merging of communities rather than towns in its study. If we were to assume that Blackwell Farm is an urban extension (as GBC contests), which is joined with Park Barn in the north western corner and with Onslow Village (via Beechcroft Drive) on the south west, then the development would form a bridge between these communities. Furthermore communities at Down Place and Pinks Hill would also be linked up. The extension of the development site westward to bring in Wildfield Farm (just 5 minutes walk from the Wood Street Village Green) also forms coalescence with this community. If the University continues to push for its stated key strategic aim of developing further west to build across its entire landholdings, then communities at Chalkpit Farm and Flexford would also merge within the urban boundary.

**Purpose 3.** The Blackwell Farm site assists strongly with “safeguarding the Countryside from encroachment” The proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland, including further Grade 2. The proposed road development with access from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop its entire landholding on this western edge of Guildford (including Chalkpit and Wildfield Farms), leading to the risk of further boundary change and further encroachment in future years.

**Purpose 4.** Blackwell Farm helps to preserve the setting and special character of the historic town of Guildford

It forms the views from the Hog’s Back ridge, which is acknowledged to be an important setting to the town, particularly through sightlines to the Cathedral. The site itself is visible along the ridge, both from the west and the east (the north-eastern corner of the site being visible from The Mount – a popular recreation area and viewing platform). Guildford Borough Council’s Landscape Character Assessment makes it clear that the Hog’s Back forms and important setting to the town:

“The steep slopes rising from the River Wey and distinctive elevated ridge landform provides a natural containment for, and backdrop to, the lower lying town centre and allows panoramic views across Guildford, to the Cathedral… To the north the arable slopes north of the A3/A31 provide an important open backdrop to the emerging Manor Park site.” (Landscape Character Assessment, Vol II, Rural Urban Fringe, p37, Jan 2007)
A Landscape Evaluation Study, by landscape architect, Land Management Services, commissioned by three parish councils – Compton, Worplesdon and Wanborough (Annex 2) – confirms that land parcel H2 is “critical to the landscape setting of the chalk ridge” (Hog’s Back Natural Beauty Evaluation, June 2016, p16)

Henry II’s Royal Hunting Park also forms a major feature of Guildford and the historic setting for the town. The deer leap alongside the edge of the hunting park is still visible within the woods that separate Blackwell Farm from the Surrey Research Park as well as the Scheduled Ancient Monument (remains of the Royal Hunting Lodge), which also sit alongside the existing green belt boundary between Manor Park and Blackwell Farm. The field patterns are also influenced by this park and features such as Strawberry Grove on the north east corner of the PDA are clearly marked in historic maps of the town, which date back to when the Royal Park was still in existence.

Purpose 5.
The more effective that parcels of Green Belt are at restricting development, the more likely they are to have an effect in assisting urban regeneration. As Blackwell Farm is close to the urban edge, it has a significant inhibiting effect on development, and because both Blackwell Farm and the land adjacent to it at Manor Park (formerly Man-or Farm) are under the control of the University of Surrey, not allowing building at Blackwell Farm would help to discourage the profligate use of land shown recently by the University. The University has 17 hectares of surface car parking that could be built over with offices and flats across its estate. This is a more sustainable option than building over open farmland (including grade 2 and 3a) within the green belt. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm).

How the green belt analysis has been used

Considering the urban-edge parcels identified by Pegasus in Guildford Borough around Guildford and Tongham, there is just one considered ‘low sensitivity’ (K6) supporting just one of four green belt purposes. There are 11 parcels considered ‘medium sensitivity’ with two purposes supported, and 26 considered ‘high sensitivity’ with three or four purposes supported. Overall, there are 42 parcels around the borough identified as of ‘low sensitivity’, but Pegasus proposed a PDA on only one of them. It proposed PDAs on all or part of six urban edge parcels of ‘medium sensitivity’ and nine of ‘high sensitivity’. The evidence therefore clearly shows that the number of green belt purposes served by parcels has had hardly any effect on the selection of sites around the borough for development. The choice of land for development around Guildford has therefore not been guided by green belt. The whole exercise of looking for plots to release which are least sensitive in green belt terms has been a sham.

Instead, the choice of sites for release has been informed only by traditional planning issues (eg AONB, flood risk, protected wildlife areas, Registered Common Land, MoD land etc) and, to a lesser extent, by environmental capacity.

Although the environmental capacity assessments have considered some relevant issues, they have ignored other important ones, such as development in the setting of the AONB and visual impact. The conclusions of GBC’s Landscape Character Assessment (LCA), which forms part of the evidence base, have been largely ignored, and this is evident in relation to Blackwell Farm, where the LCA is very clear that the views from the Hog’s Back ridge should be conserved:

“The Hog’s Back Chalk Ridge landscape should be conserved, in particular the open nature of the landscape which forms a backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along the ridge line and the sparse settlement pattern of traditional style and local materials. The intact large scale geometric field pattern and hedgerow boundaries and hedgerow trees should be conserved while there is potential to enhance and reinforce some of the hedgerows.” [Landscape Character Assessment (Chalk Ridge), 2007 p41]

In putting forward PDAs, GBC considers only landscape value (which is not the same thing as landscape character) and this is addressed only in terms of landscape designations. Furthermore, the protection of ancient woodland has been given little weight in that, even though such woodlands are not proposed to be removed, they would in some cases be severely compromised by development around them. The ancient woodland at Strawberry Grove/Manor Copse, for example, would be completely encircled should the proposed Blackwell Farm development go ahead, and a large road
would pass through, or very close, to it. The ancient woodland at Wildfield Copse would also be harmed. The weight that is given to the various environmental capacity elements other than the absolute constraints is unclear, but appears to be only slightly above zero.

An additional round of evaluation has taken place in the form of a ‘sustainability assessment’. This scores urban edge sites that come through the environmental capacity assessment free of absolute constraints. This last assessment is purely on grounds of walking distance to a selection of nine facilities. There are some oddities in this: the most obvious point of ‘walking distance to a bus stop’ has been omitted on the dubious grounds that everywhere will be served by buses, but the nearly-pointless ‘walking distance to an A-road’ remains in the mix. The 16 sites assessed are rated from zero to 3 according to distances to be walked to nine facilities. The distances at which cut-offs between the rating-points occurs varies from one facility to another, so there is some ranking of importance in this part of the process. The scores are then added up (i.e. each of the nine facilities has equal weight in this part of the exercise), with the highest number the most sustainable. The scores are then listed in descending order. Parcel H2 (Blackwell Farm) is ranked 14 overall, in other words it is one of the least sustainable sites, yet it has been put forward for development. Despite the work which went into the sustainability assessment, no use appears to have been made of it in the selection of PDAs. It is therefore unclear what the purpose was of the whole exercise.

Conclusion
The treatment of green belt in the choice of allocation sites is unacceptable. Despite going through the motions of carrying out a green belt review, the Council has selected sites for allocation for development irrespective of green belt constraints. Urban-edge sites have been chosen as if the green belt constraint did not exist at all. On not a single occasion is a green belt site retained free of development ‘because it significantly fulfils green belt purposes’. Nor is a green belt site released ‘because it has little benefit in fulfilling green belt purposes’. The green belt analysis has therefore been entirely misleading. Site selection has instead been on the basis of the Council’s selected planning preferences. The absence of actual attention to green belt constraint has played down the highly significant contribution of sites, such as H2 (Blackwell Farm), to green belt purposes, even though this should have been a fundamental consideration shaping the town’s development.

AONB

The Blackwell Farm development would result in harm to the setting of the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the AONB itself.

Harm to the AONB setting
Blackwell Farm forms part of the views into and out of the Hogs Back ridge, which is an iconic landscape feature well known in the region. The ridge is located on the northern edge of the Surrey Hills AONB and, because of its elevated position, provides dramatic views over a long distance. The proposed large-scale development at Blackwell Farm would be clearly visible from many points along the ridge, thereby blighting the setting of the AONB.

In addition to the ridge itself, there would be an impact at the very least on two footpaths, one bridleway and three further access roads (unclassified), all of which come off the A31 on the north side of the Hogs Back in, or adjacent to, the AONB, from which the setting would be a con-sideration. There would also be an impact on views from the train on the North Downs Line between Reading and Gatwick.

The setting today for the AONB at Blackwell Farm in-cludes a locally designated Area of Great Landscape Value and is arguably more beautiful than other areas within the AONB because the topography results in panoramic views over a great distance. If the planned development goes ahead, then the AONB will be seen by thousands of people in cars entering and leaving the housing estate – but the setting and views of the AONB that they would experience would be in marked contrast to those enjoyed by people today. It seems perverse to argue that developing a site would cause only slight harm because the AONB is not visible from a wide number of public locations, and then to open it up to much wider viewing by the public (through road and house building), but to destroy the beauty of the landscape in the process.

It is worth noting that the Government has, in its March 2014 National Planning Practice Guidance on Natural Environment – Landscape, emphasised the importance of protecting the setting of AONBs and National Parks. This affects proposals on land outside an AONB that might adversely affect its setting.
It states that under Section 85 of the Countryside and Rights of Way (CROW) Act 2000, “relevant authorities” are required in “exercising or performing any functions in relation to, or so as to affect land “ in an AONB to “have regard” to their purposes. It goes on to state:

“The duty is relevant in considering development pro-posals 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.”

Harm to potential future AONB
Natural England has identified the Surrey Hills as one of only two AONBs in the country where a boundary review will be considered, and has agreed to support the process of evidence gathering to inform this process.

A new piece of evidence related to this review - an independent Landscape Evaluation Study by Land Management Services – was published in June 2016 and puts forward a strong case for including most of Blackwell Farm and its surrounding area within the revised AONB boundary. (See Annex 2.)

The study was commissioned by Worplesdon, Compton and Wanborough Parish Councils when it was realised that Surrey County Council’s evaluation of the land on the northern slopes of the Hog’s Back (by consultant Hankinson and Duckett), had omitted Blackwell Farm from consideration and assessment. The Hankinson and Duckett evaluation had been funded by the Surrey Hills AONB Board as part of the AONB review process. This omission was despite a study by Alison Farmer Associates just a year earlier (in Jan 2012), which had recommended the area as meritng assessment. The Alison Farmer study, also commissioned by SCC, used up-to-date criteria, based on boundary reviews of the New Forest and South Downs National Parks. This map shows the area identified by Alison Farmer Associates for assessment.

It seems remarkable that Blackwell Farm should have been excluded from the Hankinson and Duckett evaluation, particularly given the strength of the arguments for including the area in the AONB that Land Management Services (LMS) has put forward in its report. LMS concludes:

“Land to the south and east of Wildfield Copse, in the vicinity of Down Place and Blackwell Farm (sub character areas 3 and 4) is of a landscape and scenic quality, character and condition which should merit inclusion within a revised AONB boundary… This landscape is therefore considered integral to the AONB and critical to the conservation of rural views to the north of equal, if not greater importance, to land to the west of Down Place included in Area 12- 1.” (Section 6, p23.)

The fact that the H2 included an AGLV and that Surrey County Council’s and Guildford Borough Council’s own landscape character assessments also highlighted the scenic quality of this area, makes the omission even more striking:

“The Hog’s Back has a vital role in providing a dramatic landscape setting to Guildford” [Landscape Character Assessment, Vol II, Rural Urban Fringe, p37, Jan 2007]

It is also strange that the AONB boundary selected by SCC/Surrey Hills AONB Board for Area 12-1 follows a rather arbitrary line. As the LMS Study states:

“The proposed boundary to Area 12-1 between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined landscape features (such as a ridge line, wood-land edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character (for instance increased urban influences) which might justify exclusion.” (Section 6, p23)

The Surrey Hills AONB Planning Advisor Clive Smith, in writing to the Surrey Hills AONB Board on 25th June 2013, appears to have made the same observation. He states, “the proposed boundaries do appear in places tortuous and perhaps pedantic and the consideration of scale of landscape perhaps should be consid-ered.” Mr Smith also highlighted that Natural England had advised “that boundaries should follow clear physical features such as settlement boundaries and roads”. (See Annex 3.)

Perhaps a clue as why Surrey CC/Surrey Hills AONB Board did not opt for a more robust boundary (instead selecting one which in plac-es runs through the middle of a field) and why there was no AONB evaluation of the land at Blackwell Farm lies in this extract from a report by Surrey Hills AONB Board Director Rob Fairbanks:
“The Surrey Hills Board has established that there is a high level of support for a boundary modification among local authorities, including parish councils, although concerns have been raised by Waverley and Guildford regarding the potential implication that the evaluation process and areas identified for evaluation may have on their emerging Core Strategies. As a result, it is important that all the local authorities on the AONB Board will be involved on any project steering group and the AONB partners will be made aware of the sensitive nature of the work.” – item 7 (Annex 4).

This begs the question: why do the local authorities need to be on the steering group for this project? – determining whether landscape is of AONB quality should be a purely technical exercise.

As most of land parcel H2 has been identified as an evaluation area for the forthcoming AONB boundary review, it is reasonable that GBC should treat it as though it is within the AONB during this local planning process. The field in the north eastern corner, adjacent to Chapel House Farm, which was not considered in the LMS Study to meet the criteria for AONB, should be retained, as an “important buffer and transitional landscape on the west-ern edge of Guildford” as recommended by LMS (Hogs Back Natural Beauty Evaluation, June 2016, p19.)

Harm to the AONB
The proposed access road to the new development, linking the site to the A31 in the south and to Gill Avenue in the north, would pass through the existing AONB, creating a large scar across the northern slopes of the ridge, and bisecting a tree-tunnelled, 18th century parkland drive – an attractive feature of the AONB. The road would carry two lanes of traffic and would involve a complex junction on the ridge, with substantial environmental consequences (and cost). The lighting associated with such an junction would also have an impact on the AONB for miles around.

The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and ad-jacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest (Section 1, Para 116).

Guildford Borough Council has not demonstrated that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. It would also impede commuter traffic travelling to the Hospital and Research Park (to major centres of employment) from the east.

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

KJS response (rev c2).pdf (2.6 MB)

Comment ID: PSLPS16/8064  Respondent: 8729217 / Karen Stevens  Agent:

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

Exceptional circumstances
Although the Council does not cite any exceptional circumstances that would offset harm to the AONB within the Local Plan or its supporting evidence, Council Leader Paul Spooner has put forward a number of benefits that he considers the development would deliver. These were outlined in his answer to my question to the Council Executive Committee on May 11, 2016 (See http://www2.guildford.gov.uk/councilmeetings/documents/b1616/Supplementary%20Information%20Sheet%2011th-May-2016%20Executive.pdf?T=9) and include:
1. Provision of the access road through the site, which will provide an alternative route into Surrey Research Park and the Royal Surrey County Hospital from the west via the A31 and relieve pressure on the A3 and Egerton Road.

2. Provision of on-site infrastructure, including traveller pitches, a new local centre with associated community and retail uses, a primary school, part of the Sustainable Movement Corridor linking the site to the town centre and beyond, Suitable Alternative Natural Greenspace (SANG) and other open space.

3. A significant expansion of the Surrey Research Park, which will enable Guildford to build on its knowledge-based industry, which is of regional significance.

4. Provide enhanced justification to Government for a new Guildford West railway station as there will be a better business case with the additional employment and residential demand.

I have outlined below why I do not believe that any of these “benefits”, either alone or collectively, can be considered “exceptional” enough to justify:

- taking 78 Ha out of green belt
- harming the AONB and its setting
- threatening further areas of green belt and AONB in future years.

### Provision of an alternative route to the Surrey Research Park and Hospital

See Section 3 (Viability)

### Provision of on-site infrastructure,

Cllr Spooner cites the provision of a range of infrastructure as a benefit to the site and the existing community. This includes:

- traveller pitches,
- a new local centre with associated community and retail uses,
- a primary school,
- part of the Sustainable Movement Corridor linking the site to the town centre and beyond,
- Suitable Alternative Natural Greenspace (SANG) and other open space.

### Traveller pitches

From an infrastructure point of view, this site offers no particular benefit as a location for traveller pitches. As stated earlier, Blackwell Farm is in a rural location, disconnected from the fabric of the town, and has no sewerage or gas infrastructure, no schools etc. Furthermore, the requirement for traveller pitches can be met in other locations, which

- are not performing the functions of green belt so strongly
- do not form the setting to the AONB
- have not been identified as a potential candidate area for inclusion within the revised Surrey Hills AONB boundary
- do not require a new road and 4-way junction to be built in the AONB.

The provision of traveller pitches, therefore, does not form an “exceptional” circumstance

### New local centre with associated community and retail uses

Any new local centre at this location would be of benefit only to those people living in the proposed new Blackwell Farm housing development (not the existing community). If 1,800 houses were not located at Blackwell Farm, then there would be no need for this facility. It is therefore, not, in itself, an “exceptional circumstance” for building in the green belt and developing the AONB.

### Primary school

A new primary school, like the local centre, would be provided largely to serve the proposed new community at Blackwell Farm. There are already four junior schools serving this west side of Guildford, three of which are within a two-mile radius of Blackwell Farm – Guildford Grove School (1.1 miles away), Queen Eleanor’s C of E (aided) School, (1.3 miles away), St Joseph’s Catholic Primary School (1.7 miles away). If there is a need for additional school places to serve the existing community, these could be provided as part of Guildford Grove School on the existing King’s College School campus. King’s College is currently 57% undersubscribed.
Although King’s College is a high school, it is adjacent to the Grove School and could easily offer additional class-rooms to its neighbouring junior school if these were needed. Even if the under-utilised classrooms at King’s College were not deemed suitable, the campus itself is very large (see image above right) and there is plenty of space for Grove School to expand. There would be no signiﬁcant loss of playing fields, and in any case the University-owned Surrey Sports Park, with its many playing fields, is only a 13 minute walk from the school, and a 3 minute drive away (without traffic). GBC does not seem to have explored these alternatives at all, and instead has chosen to site a new school at Blackwell Farm in the green belt (within the setting to the AONB).

The provision of a school is not an “exceptional circumstance” for building in this environmentally sensitive area. There are other, more appropriate, locations for a new school – locations that are not served as well by existing schools, and which would result in fewer peak-hour traffic movements (as children would be travelling shorter distances to go to school). This would be a more sensible option than bringing more peak-hour traffic into this already congested area.

Sustainable Movement Corridor

The Sustainable Movement Corridor is described in the draft Local Plan as “providing a priority route for buses, pedestrians and cyclists through the Guildford Urban area and serving new communities at Blackwell Farm, Gosden Hill Farm and Slyﬁeld Area Regeneration Project”. Beyond this, no further detail is given, other than that the Corridor is estimated to cost between £80-90 million and that this cost would be shared between the developer and the Local Growth Fund (via the Local Enterprise Partnership). No economic viability assessment for the scheme is provided, and there is no account of how the road net-work would be used or how proposed bus service would be funded going forwards (especially relevant in a climate where Surrey County Council is cutting back on its public transport budget).

Aside from the question of its economic viability, the provision of the Sustainable Movement Corridor is not dependent on the Blackwell Farm development going ahead in any way other than, perhaps, through the funding that would be provided by the University. Allowing development in exchange for funding for infrastructure does not form an “exceptional circumstance” for building in the green belt and in the AONB setting. If this were to be the case, a developer need only offer to pay for a school or road, and it would be given carte blanche to build anywhere.

SANG and other open space

The final on-site beneﬁt Cllr Spooner cites is the provision of SANG and other open space.

SANG - The University has conﬁrmed at a stakeholder meeting held in March 2015 that it would only provide SANG to mitigate against development on its own land-holdings; it would not offer SANG to unlock housing elsewhere. It seems perverse to argue that SANG is a beneﬁt to the wider community because it enables land in the green belt and AONB to be developed.

The submission draft of the Local Plan does not identify which area of Blackwell Farm will be allocated as SANG on Blackwell Farm. In a previous (Regulation 18) draft of the Local Plan, the ancient woodland at Manor Copse/Strawberry Grove was allocated for this purpose. Natural England has stated that the identiﬁcation of SANGs should “seek to avoid sites of high nature conservation value”, such as ancient woodland, which are likely to be damaged by increased visitor numbers. [Natural England Guidelines for the creation of Suitable Accessible Natural Green Space (SANGS) Introduction 12-06-08]

Open space - The land at Blackwell Farm is already enjoyed by the residents of the surrounding communities of Park Barn, Wood Street Village, Onslow Village, Down Place and Flexford, who walk along the public/permissive footpaths and bridleway that cross the site. [Footnote 1] It is diﬃcult to see what beneﬁt developing 78 hectares of this farmland would bring to these residents.

Furthermore, the University has already promised to open up Blackwell Farm for “informal recreation”. In the run-up to the 2003 Local Plan, in order to allay fears at the time that the boundary review at Manor Farm signalled further loss of green belt at the adjacent Blackwell Farm, the University stated:

“The University has no plans for the development of its adjoining land at Blackwell Farm. In partnership with the Borough Council, the University intends to explore how the woodland and adjoining land at Blackwell Farm could be opened up to the public for informal recreation and link to existing areas of open space. Access would be gained via...
existing public footpaths crossing the site.” [Surrey Matters (University of Surrey newsletter), published in January 1998]

This intention was also included in GBC’s Local Plan 2003:

“The University has indicated that they...would like to explore how best appropriate parts of its Blackwell Farm lands might be further opened up to the com-munity (including the possibility of a country park).” (16.26)

The University has done nothing to honour this commit-ment - erecting signs that discouraged use of Blackwell Farm and allowing the rides through the ancient wood-land to become impassable. These signs remained in place until June 2015, when new signs appeared.

Given that the University has already committed to pro-vide this informal recreation space at Blackwell Farm (and reneged on it), there can be little benefit to the community receiving the same (potentially empty) promise again.

[Note. A study by the University’s consultant into why members of the public uses this land and what changes they would like to see, appears to have been kept under wraps.(See Annex 5)]

The research park is a low density development and there is great potential to increase capacity on this site - without having to expand onto Blackwell Farm next door

Expansion of the Research Park

Cllr Spooner writes in response to my formal question to the Council Executive:

“A particular benefit of allocating Blackwell Farm is that it enables an extension to the Surrey Research Park, which is key to meeting our objectively assessed need. It is also a unique opportunity that enables us to build on knowledge-based employment that is of re-gional significance. This type of specialist employment could not be provided elsewhere in the borough.” [Sup-plementary Information Sheet, Guildford Borough Council Exec Meeting, May 11, 2016]

This “particular benefit” of allocating Blackwell Farm therefore seems to hinge on two arguments:

- Extension to the Surrey Research Park is key to meet-ing GBC’s objectively assessed need
- The opportunity to build on Guildford’s knowl-edge-based employment is unique to the Research Park and cannot be provided elsewhere in the borough

Both these arguments can be challenged, firstly:

- There is no need to extend the Research Park in order to meet GBC’s objectively assessed need because there is enough space on the existing footprint of the Research Park to meet the likely growth in the research and development (R&D) sector.
- There is already granted consent to expand by a further 9,000 square metres (14%). This space has been available for 10 years and is still to find a taker. It would appear from GBC’s own analysis that this would be sufficient to meet the demand for floor space in this sector. Guildford Borough’s Econom-ic Land Needs Assessment (ELNA 2015), gives an annual floor space demand of 0.7% for office/research and development (Table 6-4 PMA Floorspace Growth Forecast CAGR). The necessary growth in floor space over the plan period is therefore 12% (17 years x 0.7%), which is less than the current expansion space of 14%.
- Even if growth in the R&D sector were to exceed that forecast in the ELNA, the existing Research Park has been built at a very low density. It provides just 65,000m2 of office space on 27 hectares of land. There is scope to use this land more efficiently by building additional office space above the surface car parks, and by introducing mixed-use development across the site (so the area can be used for 24 hours a day, rather than just during office hours). Building at the same plot-ratio as the approved Master Plan for Manor Park would provide six times the office accommodation on the Research Park than exists at present. With better design on its existing brownfield estate, the University has the room to grow for the next 100 years without taking more greenfield land out of green belt.

Secondly, it is not true that the Surrey Research Park is unique in providing knowledge-based employment and that this type of employment cannot be provided else-where in the borough:
Policy E4 states: “The existing 28 hectare Surrey Research Park and the proposed extension will be protected for business use comprising offices, research, development and design 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.”

The inclusion of B1c uses (light industrial) will mean that the Surrey Research Park would lose its status as a “research park” and become no different to any business park across the borough; it certainly would not be “unique” as a centre for knowledge-based industry.

Knowledge-based businesses are already located in other areas of the borough, for example EA Games is situated in the town centre (Onslow Street), and advertises itself as “a 5 minute walk from the main train station and only minutes away from the town’s main shops, restaurants and bars”.

There is no evidence to suggest that businesses prefer out-of-town locations, in fact the ELNA suggests that 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, 7.3.2)

The University has argued that an important factor in attracting knowledge-based businesses to the Research Park is the proximity to, and contacts with, the University.

However, a survey conducted by the University in 2002 showed that less than half of the companies on the site (27 out of 46) believed this factor was of “weak or no influence”, and only 6 cited it as the “most important” factor.

The same survey also showed that links with other tenants on the Research Park was of even less importance (39 out of 46 said it was of “weak or no influence” and none felt it was the “most important” location factor). [See Annex 6 “A Vision of the future of Science Parks” para 28, by Dr Malcolm Parry, Managing Director, Surrey Research Park and University Planning Officer, 2002]. Based on this survey, it would appear that the Research Park offers little additional benefit to knowledge-based companies over other locations. In fact, the survey showed that the most influential factor attracting businesses was Guildford’s close proximity to international airports, road and rail links, which is applicable to locations almost anywhere in the borough.

Even if proximity to the University were considered essential to the growth of this business sector, Blackwell Farm would not be the best location to offer this. There are many sites in the urban centre much nearer to the University campus at Stag Hill, than this one. Manor Park is home only to the recently built Vet School.

Provide enhanced justification to Government for a new Guildford West railway station

As Cllr Spooner acknowledges, the business case for the new Guildford West station has not been proven. It also does not appear that the traffic impact of the new station has been looked at in any detail, as a rail halt at this location might bring more commuter traffic to this heavily congested area. Certainly the proposed station has not yet been assessed by Network Rail from an engineering or economic point of view, as a Freedom of Information request reveals:

“We understand that the Council has engaged a consultant to produce a GRIP 2 study to further investigate the feasibility of a station called Guildford West (previously known as Park Barn). We intend to review the study once it has finished and provide feedback from a railway perspective.”

Even if the new rail halt were to be considered viable from an engineering point of view (and GBC planners have acknowledged that there are likely to be problems with gradients at this location), it does not seem right that GBC should be ‘manufacturing’ an economic case for the station by proposing more housing and employment land in the vicinity. This certainly does not seem to be an ‘exceptional circumstance’ for building in the green belt within the AONB setting.

**Conclusion**

Blackwell Farm is the only major development being put forward in the Local Plan that will impact on the AONB and the setting of the AONB. In law, AONBs should be given the “highest level of protection”. We do not believe that GBC has given due consideration to the AONB; but rather has ignored this constraint entirely, and so the Plan is unsound in this regard.
Viability

The provision of an alternative route to the Surrey Research Park and Hospital, which Cllr Spooner has described as the “main benefit” to the community of developing Blackwell Farm, is not outlined in any detail. Whilst this alternative route might be a benefit to the owner of the Research Park (through its ability to charge higher rates for the office space) and to some businesses on the Park (by attracting more staff from the west), the greatest community benefits would be to those staff members who might be living on the west of the borough who would use the new route to access their place of work - without having to join the increased queues at Gill Avenue and the Tesco roundabout. However the net benefit does not appear to have been assessed (which needs to consider increased journey time for any workers who would be accessing the site from other parts of Guildford (via Gill Avenue/Tesco roundabout) from the east and the net community benefit could easily be negative as a result of this new development.

Furthermore, from information provided in the Plan and in the supporting Transport Assessment, and from communications with Surrey County Council’s Transport Development Planning Manager West, Mike Green (see Annex 7), it seems that the new road depends on the following 4 schemes:

1. A new signalised all-ways junction on the A31
2. A tortuous road through the new development (to deter rat running) and possibly a secondary route with restricted access, possibly controlled by automatic number plate recognition (ANPR)
3. Changes to the Tesco roundabout on Gill Avenue
4. Widening of the A3

The viability of implementing these 4 schemes is covered in the Technical Note prepared by traffic consultant RGP and commissioned jointly by Compton PC and Compton Village Association (Annex 8). However, at least three of these schemes are fraught with difficulties that make it questionable, from a highways point of view, whether they could be delivered at all.

1. It is not certain that a signalised all-ways junction would be adequate to cope with the volume of traffic that would use the new route. This is the conclusion reached in RGP’s Technical Note. Surrey County Council acknowledges that a roundabout on the A31 further west would be a better option in highways terms, and indeed a roundabout further west was the option of choice put forward by the University when it first outlined its plans for Blackwell Farm to the Guildford Society on February 18, 2014. Guildford Borough Council has since stated that a roundabout would be unacceptable in terms of impact on the AONB and traffic. The Council has failed to provide any details of route options studies taken for this access, despite repeated requests (see Annex 9) and despite Surrey County Council stating that such studies were undertaken by Guildford Borough Council and are in the public domain. Even if a signalised junction were to prove adequate, RGP points out that this would require four lanes of traffic, and that in order to accommodate this, the bridge over the A3 would need to be widened, adding significantly to the overall cost of the scheme and casting doubt on its economic viability.

2. Taking traffic on a tortuous route through a residential estate simply to deter rat running is neither sustainable nor safe, and such a route would not be suitable for use by emergency vehicles from the hospital, which often need to travel at speed. The roads through the Manor Park Campus and the Research Park were not designed for a large volume of traffic. Indeed, Manor Park was promised by the University as a “world class car-free campus” so putting a major highway through it would mean another broken commitment.

The Manor Farm Master Plan (2003) also makes it clear that this was to be “a sustainable and predominantly car-free campus, with the objective of restricting net increase in car travel to less than 5% of the University’s current and committed traffic generation (including the Surrey Research Park) measured at peak times.” (Section 5.1)
The road would also have to pass through, or very close to, a belt of ancient woodland. Given that commuters to Guildford from the west would be feeding into the existing bottleneck at Egerton Road/Gill Avenue, traffic is likely to be at a standstill during peak hours and this will create further problems for residents, students and the ancient woodland in terms of pollution.

ANPR would be fraught with difficulties – legal and administrative. What about visitors choosing to leave by the opposite route or delivery vehicles continuing through the site and out the other side? How would GBC keep up with changes in residents’/employees’ vehicles and who profits from fines or bears any losses? This whole idea smacks of “clutching at straws” and does not appear to have been thought through.

1. The Strategic Highway Assessment (June 2016) mentions “improvements to the Tesco and Cathedral junction” (3.2.1), but no further illustration or explanation of these improvements is given. Again, GBC has ignored repeated requests to have these modifications explained. What is made clear, however, is that these “improvements”, whilst they might alleviate traffic on the A3, would not mitigate against the volume of traffic generated by the new development at Blackwell Farm, and that this would impact on the Egerton Road/Gill Avenue junction.

“although there is a proposal to improve it [Tesco Junction], the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.” (14.9.5)

It is not clear what improvement could be made to increase capacity at this junction: Gill Avenue has already been widened and widening Egerton Road would involve widening the road bridge over the railway line, for which no funding has been allocated.

Additional traffic at this junction could potentially impede access/egress from the A&E unit, which was identified as a problem by the Inspector at the 2003 Local Plan Inquiry. He recommended a cap of 5% on traffic generated by the Manor Farm site.

The Inspector’s Report states, “As a safeguard, it is implicit in the agreement that if the 5% ceiling cannot be achieved, the scale of development would also need to be limited.” The University’s latest survey shows that overall traffic with permissions already granted would exceed the 5% cap. The University consultant (PBA) has fudged the figures by removing buses and construction vehicles. Even had the cap not been breached, it would certainly be once the cars from 1,800 homes, an extended business park, a school, a supermarket and a new station are added to the mix. Furthermore, the change from B1a (offices) to B1c (light industrial) may mean that more HGVs use this route, which could add to problems at this junction as well as on the business park and student campus – neither of which were designed for this type of traffic.

The Blackwell Farm development is dependent on Highways England committing to widening of the A3 between the A31 and A320. To date, HE has not told Guildford Borough Council what it plans to do, and adding a lane along this stretch is not straightforward because, as Neil Taylor (Director of Development at Guildford Borough Council) has pointed out, it is a “tight squeeze”. Putting forward a site without any tangible commitment from HE to provide the infrastructure necessary for sustainable delivery goes against Government policy (NPPF Section 6; para 47).

In addition to the difficulties in providing access to this proposed site from a highways point of view, it would appear that the new access road is unlikely to be economically viable either. The Technical Note produced by RGP indicates that the costs involved (£50-60m) have been grossly underestimated, and that they would not justify a 1,800 home development. In addition to the cost of road infrastructure, there are other infrastructure costs, eg:

- Suds (or reservoirs) to prevent surface water run-off flooding residential areas further north, eg at Wood Street Village. During heavy rainfall there would be 3.89 million gallons of water running off the Hog’s Back (based on one inch per hour, and one inch on one acre = 22,000 gallons). This would require at least two sudus to release flows at a controlled rate, one of which would ideally need to be located in the area allocated for the Research Park extension (due to topography)
• A primary school
• Sewerage - 1,800 homes would produce 300,000 gallons of sewage per day. It is not explained in the Plan where this sewage would be treated. If it were directed to the Hockford sewage treatment works at Pirbright, this would mean building new trunk sewers across Broadstreet Common, as the existing sewers are already overloaded. Similarly, directing the sewage to the relocated treatment works in Slyfield would involve building new trunk sewers. Both options would likely require a new pumping station on the site
• Construction costs. These are likely to be unusually high - Blackwell Farm is situated where clay is next to chalk and this can lead to instability and subsidence. The whole area already suffers subsidence problems – it was the reason the former Vice Chancellor Professor Snowden cited for vacating his official residence at Blackwell Farm. It may also have been the reason why UniS demolished the halls of residence (Stag Hill is also on clay). To mitigate against this, deeper foundations would be required, adding to building costs. The whole area is also subject to high levels of radon and houses located here may require remedial ventilation, again pushing up the costs

Given all the above factors, it seems highly unlikely that the developer would be able to provide a significant proportion of affordable houses on the Blackwell Farm site.

Conclusion
Aside from environmental and landscape considerations – ie the loss of important and effective green belt and harm to the AONB and its setting – there are clearly significant infrastructure problems to be overcome before this site could be allocated in the Local Plan. The site infrastructure is not deliverable within the budget outlined in the Plan, which is already well above what would be expected for a development of this size. More worrying, perhaps, is that development here would exacerbate existing problems on the road network, and at the north east end of the site it would impede access to the hospital’s A&E department and a major incident unit. There is a sense that this site has been thrown into the mix simply to keep the University happy, with the intention of resolving the infrastructure/access problems down the line (at the planning application stage). This approach to plan making is far from sound, and proposals mentioned by Surrey County Highways and the University to introduce tortuous routes and Automatic Number Plate Recognition are unsustainable and unrealistic. If GBC has to resort to such measures to try to make the access work, then clearly a large-scale development at Blackwell Farm is in the wrong location.

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

Attached documents:  
- Save Hogs Back Brochure (electronic) (6).pdf (2.0 MB)
- KJS response (rev c2).pdf (2.6 MB)
Rather than conducting this consultation in the spirit of openness and fairness, GBC appears to be bending the facts to meet its own agenda, which includes plans to develop Blackwell Farm. Most notable examples of this are:

- The description of Blackwell Farm as within the “Guildford Urban Area” when it clearly is not
- The description of Blackwell Farm as an “urban extension” and the doctoring of maps to remove belts of woodland to make the site look as though it is adjacent to the Research Park.
- Telling the public that the Plan has no development within the AGLV and AONB, when the Blackwell Farm development and associated infrastructure falls within both these land designations.
- The video, which appears prominently on the Local Plan web page, originally purporting to reflect “the views of local people” (later changed to “some local people”). This video is unbalanced and unrepresentative. More than 7,000 people responded to the last consultation on the draft Local Plan and it was widely accepted that the vast majority of these objected to it. Yet we did not hear a single voice of dissent in this video.
- Questions from some Councillors to public speakers in the chamber have shown a clear bias towards development of 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: pslp172/3999  Respondent: 8729217 / Karen Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

My overall objections to development on Blackwell Farm were spelt out last year in Local Plan Consultation – Objection to site selection Blackwell Farm (A26) – July 2016. Issues raised in this document apply to the amended proposals in the latest Local Plan document. I have therefore commented on the following specific changes in policy A26 (Blackwell Farm) made in the latest iteration of the Local Plan:

- The phased delivery of housing, with a minimum of 1,500 delivered during the Plan period (Allocation (1))
- The addition of a new secondary school on the site (up to six form entry, of which two forms are needed for the housing on the site, and the remainder for the wider area) (Allocation (9))
- Changes to vehicular access (Infrastructure requirement (1))
- The proposal to “control” a through-vehicular link (Infrastructure requirement (3))
- The requirement for the developer to “have regard to” the Sustainable Movement Corridor Supplementary Planning Document
- The addition of a significant bus network to serve the site and key destinations including the existing western suburbs of Guildford and the town centre (Infrastructure Requirement (5))

I have outlined the reason for my objections to these changes below.

The phased delivery of housing, with a minimum of 1,500 delivered during the Plan period (Allocation (1))

I object to the delivery of a minimum of 1,500 homes on Blackwell Farm in this iteration of the Local Plan. There is an oversupply of housing built into this Plan, even with the inflated OAN of 12,426 homes (3.2), and therefore it is not acceptable to put forward an area of high environmental sensitivity that is not needed in this Local Plan period. Any buffer required by the plan could be provided by building more densely. The objectively assessed housing need has reduced from 13,860 to 12,426 (3.2). Blackwell Farm should not have been selected as a proposed development area due to:

- Its impact of the development on the Surrey Hills Area of Outstanding Natural Beauty (AONB)
- Its role in effectively fulfilling the purposes of the green belt
- Its access problems, which render the site undeliverable
The impact on the AONB was spelt out in detail in my response to the consultation of July 2016 and in the *Hog’s Back Natural Beauty Evaluation* by Landscape Architects Land Management Services (Annex 2).

The role of Blackwell Farm in fulfilling the purposes of Green Belt was covered in my July 2016 response and also in the report titled: *The Purpose of Green Belt – Blackwell Farm*, (Annex 6).

Proposed access arrangements have changed in this latest draft of the Local Plan, and my comments/objections are set out on pages 32 to 39.

**The addition of a new secondary school on the site**

The addition of a secondary school at Blackwell Farm would exacerbate traffic problems on the adjacent road network (local and strategic), particularly as this latest version of the Plan states that the school is to be sited “to the north of the site” (Infrastructure schedule SED3). The inclusion of a six-form entry school, which would attract significant peak-time traffic through a highly congested area, has not been considered in the traffic model.

**Changes to vehicular access**

I object to the changes to vehicular access to the A26 (Blackwell Farm) PDA. Instead of citing the A31 as the primary access to the development, the latest version of the Plan does not determine where the primary access will be. Similarly, the access/egress to Egerton Road is only ‘preferably’ via Gill Avenue. Other options for the access to Egerton Road are not given. This suggests that the routes into and out of the site have not yet been established or properly thought through.

[Figure 13] – Tailbacks from the Tesco roundabout onto the A3 and back to the A31 mean that ambulances are delayed in responding to emergencies and it causes particular inefficiency to the ambulance service in non-emergency situations as ambulances queue up alongside other road users.

Any change that gives greater priority to the Egerton Road/Gill Avenue access/egress will result in:

- increased traffic flows across the Cathedral and Egerton Road (Tesco) roundabouts. The SHAR shows that, despite the upgrade to the Egerton Road roundabout, the junction would be over capacity (and this excludes traffic generated by the new secondary school and new “Guildford West” station);
- increased rat-running through residential roads in Onslow Village, Park Barn, and Westborough – queues already form back to Queen Eleanor’s Primary School on Queen Eleanor’s Road at morning peak times and this problem will be exacerbated as drivers rat-run through Onslow Village to avoid delays on the A31 approach into Guildford;
- increased traffic backing up onto the A3. Even if the A3 widening goes ahead (which is uncertain) the A3 will remain over capacity between the Cathedral roundabout and the A31 (see SHAR Figure 4.7 and Table 4.5); and
- delays to ambulances heading to the A&E department from the town, which lies adjacent to the roundabout. Ambulances already struggle to cross this roundabout at peak hours (Figure 13).

**The proposal to control a through-vehicular link (Infrastructure requirement (3))**

I object to the proposal to “control” a section of the through-vehicular link from the A31 to Gill Avenue (policy A26 Infrastructure requirement (3)). The Plan does not state how this control is to be implemented, although officers at Guildford Borough Council and Surrey County Council have suggested that automatic number plate recognition (ANPR) cameras might be used. If the access road becomes an adopted highway, the highway authority would need to agree to ANPR being used, and this is not certain (Annexes 7 and 8), which means that the controlled section of the A31- Egerton Road link may well have to remain a private road.

A private road is not a practical option as its upkeep/policing would be the responsibility of a private organisation, which would be less reliable than if it rested with the local authority. Furthermore, if the Blackwell Farm site were sold off in parcels to developers, as the University stated at its Bite Size Briefing on 12 December 2013, then responsibility for the road would be divided and it would be even more difficult to guarantee its ongoing maintenance/policing.

There is a strong risk that trying to control a section of this new road would not work in practice, and that this proposed link from the A31 to Egerton Road would become a rat run through the AONB for all the traffic heading into Guildford from the west. As discussed above and in my earlier response document, neither the local road network nor the strategic...
network (A3) would be able to cope with this influx of vehicles crossing the Egerton Road roundabout, even if the junction is upgraded.

In addition, the impracticality of controlling a section of this new access road would have an adverse impact at the southern (A31) end of the link. Without controls in place, the new road would attract traffic from the wider network to the south, for example from Godalming, Farncombe, and Shalford. This traffic would head north-west along the B3000 (through The Street in Compton) and north up Down Lane. Down Lane has recently been designated a “Quiet Lane” by Surrey County Council and the B3000 already experiences high volumes of traffic. High levels of nitrogen oxides, which are well above the EU legal limit, have been consistently recorded over three years at one residential location on the B3000 in Compton.

The Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites, June 2017 states: “In 2016 a detailed air quality assessment of emissions from traffic passing through the area along the B3000 (The Street) was carried out. The results of this assessment show that there are residential receptors at which the NO2 concentration is above the associated objective. However, it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective into the future, without additional measures being required locally.” (2.3)

Clearly any new road traffic scheme which would increase flows through Compton (such as an uncontrolled link road through Blackwell Farm) would adversely impact air quality and mean that measures need to be implemented.

Requirement for the developer to “have regard to” the Sustainable Movement Corridor Supplementary Planning Document

There is no published Sustainable Movement Corridor Supplementary Planning document accompanying this version of the Local Plan and therefore I object to the inclusion of a requirement that is not fully explained within this policy (A26).

The most recent proposals for the SMC involve reducing road capacity along some of the busiest sections of Guildford’s road network in order to create bus and cycle lanes. However, this is not feasible in a town that is regularly gridlocked, and which is ranked sixth among Britain’s most congested towns/cities. Furthermore, it unlikely that the SMC would encourage any kind of “modal shift” as many of the routes proposed for cyclists would be unattractive, unsafe and probably polluted.

The addition of a significant bus network to serve the site and key destinations including the existing western suburbs of Guildford and the town centre (Infrastructure Requirement (5))

Whilst I support sustainable transport, I have been advised by Gordon Adam, a Fellow of the Chartered Institute of Highways and Transportation[13] that Guildford town’s population is too small to sustain a viable passenger transport system and therefore I object to this proposal, and any reliance within the Plan on modal shift.

Furthermore, the infrastructure schedule does not confirm how this new bus service (BT6) is to be funded, although the suggestion is that the developer would be expected to contribute upfront towards its costs. This would add to the already unacceptable infrastructure burden placed on the developer of Blackwell Farm and raises questions of economic viability (contrary to NPPF Para 173).

Access problems, which render the site undeliverable

This latest draft of the Local Plan has still not satisfactorily addressed the access problems to the site and it is therefore unsound. The site is dependent on two infrastructure requirements: 1) widening of the A3 between the A31 and Stoke Roundabout; and 2) a “controlled” link from the A31 to Gill Avenue/Egerton Road Roundabout. The former is uncertain, and the latter is impractical.

[Figure 14] – Traffic on A3 northbound carriageway during the morning peak on April 24, 2017

Widening of the A3
The only way that the strategic road network could cope with the cumulative impact of growth on the scale proposed in the Local Plan, would be if the A3 widening RIS2 scheme went ahead[14], but any reliance on this road scheme would be misplaced as there is no certainty that it would be delivered either within the Plan period or beyond. Patrick Blake, HE Area 3 Spatial Planning Manager, writes of the scheme:

“This is not a committed scheme and we are currently at the early stages of developing a business case which will include how proposals will achieve value for money. We anticipate any decisions of schemes to be funded for the next Roads Investment Strategy to be taken in 2019. This would be a Ministerial decision (facilitated by the Department for Transport) not Highways England and timing of decisions could change.

[13] Gordon Adam is Principal Development Engineer at Wokingham Borough Council with 25 years’ experience in strategic modelling, transport planning and policy, travel planning and development control. He is a member of the Chartered Institute of Logistics, a fellow of the Chartered Institute of Highways and Transportation and a member of the Transport Planners Society


On this basis, it is accepted that **there is a level of uncertainty on the delivery of critical infrastructure necessary to facilitate growth on allocated strategic sites identified in Guildford’s Local Plan. We have been working with Guildford and Surrey County Council to ensure that the Local Plan provides a planning policy framework to ensure development does not come forward ahead of critical infrastructure to mitigate any potential adverse impacts to the A3 and M25.**”

(Email from Patrick Blake to Karen Stevens, April 13, 2017 [Emphasis mine.] – Annex 3)

It is unsound for GBC to be basing its plan-making on the uncertain delivery of the A3 widening scheme.)

Furthermore, Table 4.5 of the Strategic Highway Assessment Report (SHAR), shows that if the A3 were to be widened, this would result in a 16% increase in traffic volumes northbound on the A31 through Compton – an area where levels of NO2 exceeding EU legal limits have consistently been recorded. The Air Quality Review accompanying the Local Plan states that this location “was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO2 concentrations measured in the area.” (4.1)[15] (emphasis mine). It is difficult to see how GBC is going to achieve this decrease with more than 1,000 vehicles per hour passing through the area in just one direction for three hours every weekday morning.

Despite HE making it clear in its original response[16] to the Reg 19 draft of the Local Plan that “**There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period**, and despite the known problems of air pollution in Compton that would be exacerbated if the A3 widening went ahead, GBC is pushing ahead with its development proposals, and trying to pressurise HE into changing its position and deferring strategic highways issues until the planning application stage (Annex 9 and 10 ). GBC also appears to be trying to brush Compton’s air pollution problem under the carpet challenging the NO2 readings on spurious grounds (Annex 9).

“Controlled” link - A31 to Gill Avenue/Egerton Road Roundabout

Rights of way

The Council’s Deputy Leader has stated that delivery of the Blackwell Farm development is dependent on a new “western link” road from the A31 to Egerton Road, and under this new plan, it is confirmed that this new road requires a section to be controlled. (Policy A21 - Infrastructure requirements (3)).

New signalised junction on A31 - impact on SRN (A3)

Although controlling the access would reduce usage of this new link, introducing a new signalised junction on the A31 would add to queues on the strategic road network (A3). This problem was identified in Highways England’s response to the 2016 Local Plan, which was subsequently withdrawn following a meeting with GBC on September 1.
This HE response stated:

"Whilst the new access is proposed just off the A3 on the adjoining A31, the traffic impacts of these proposals could potentially lead to significant detrimental impacts on the A3. Whilst Highways England has a number of significant concerns with the Strategic Highway Assessment modelling evidence base underpinning the Local Plan, it does suggest that Scenario 3, which includes the new Blackwell Farm access onto the A31, leads to a worsening of traffic impacts on the SAN.” [Emphasis mine.]

HE also adds:

"To date neither the Local Plan nor its transport evidence base has confirmed that the new access is essential for the delivery of the Blackwell Farm site in line with Circular 02/2013 or that the new junction can be delivered safely without compromising traffic flow along the A3. The proposed ‘relief to the A31/A3 junction’ has not been evidenced. The proposed new access and link road associated with the Blackwell Farm development is therefore not considered Justified, Effective, or “sound” in line with the NPPF.”


[Figure 15] – “Queues likely” signs on A31 warn of rush-hour queues on A31. On the right-hand lane, these queues lead all the way to Guildford down the Farnham Road. On the left-hand lane, these queues lead to the A3 slip road and subsequent turn off for the Tesco roundabout at Egerton Road

The original plan for access to the Blackwell Farm site, described by the UniS was to construct “a massive piece of kit[17]” comprising of a lit, grade-separated junction on the top of the A31 ridge. This proposal followed an analysis by the University[18] for access to and from the site. The proposal to provide access along the Down Place driveway was originally dismissed as being impractical by representatives of the University. It is clear from studies undertaken by RGP and from observations of tailbacks out of Guildford (along the A31) and past the Down Place entrance that this solution is not viable.

Despite requests to look at the analysis of options for access to the site by the University and a follow up FOI request to GBC, it has not been possible to obtain a copy of the document, which originally dismissed the Down Place junction as impractical. The reason given by GBC was that this information is commercially confidential, presumably as it shows that access issues demonstrate the Blackwell Farm site development is not viable.

New signalised junction on A31 - impact on LRN (A3)

Although this version of the Plan no longer identifies the proposed new A31 junction as the main access to the Blackwell Farm site (Policy A26, Infrastructure Requirement (1)), this change is insufficient to address the traffic problems that would occur on the local road network to the south of Guildford should a new junction be installed on the A31.

Almost every weekday morning, peak-hour traffic heading east towards Guildford is backed up beyond the proposed site of the junction and also beyond the A3 slip road (Figure 16). GBC’s traffic model does not appear to accurately reflect this problem, and this gap in the traffic modelling data is pointed out by HE in its response:

“The journey time validation meets DMRB criteria within the borough of Guildford. However, it is noted that the A31 journey time routes five and six do not extend west of the junction with the A3. Therefore it is not known if the model is accurately reflecting peak delays on the A31 at its junction with the A3 during the average AM peak hour.” [Emphasis mine.]

If the new signalised junction goes ahead, there will be even more queuing on the A31 (Hog’s Back), especially if the A3 is also widened, as this will lead to a 9% increase in traffic on the eastbound carriageway (SHAR Table 4.5). Any hold-ups on the A31 result in increased traffic through the villages of Puttenham, Compton, Farncombe and Artington as Guildford-bound drivers seek out the fastest route. The Puttenham interchange, in particular, is an accident “hot spot”, and as discussed above, high levels of nitrogen oxides, which are well above the EU legal limit, have been consistently recorded at the A3 end of the B3000 in Compton.

[17] Presentation by Terence O’Rourke, representing University proposal at Guildford Society, February 13, 2014
[18] This position was confirmed in a discussion between UniS and a resident of Down Place.
Figure 16 - Eastbound traffic on the A31 backing up to beyond the proposed access to the Blackwell Farm development (Morning peak, May 23, 2017)

Figure 17 (taken from Google maps) indicate levels of traffic along the A31 on the approach to Guildford on a typical weekday morning in the rush hour (during the University term). They demonstrate that when congestion occurs along the A31, vehicles will take alternative routes into Guildford, through Compton, and through the section which is experiencing air quality problems. This is contrary to the NPPF (para 171) and is therefore unsound.

Figure 17, shows that the shortest route (A) from Puttenham to Guildford Station Car Park on 08 March 2017, takes the longest journey time (31 mins). Route (B) shows that time can be saved by rat-running down Wodeland Avenue and cutting over the Mount (29 mins).

When the A31 (Hog’s Back) is congested, the longest route (in journey miles) through Compton, Binscombe, Farncombe and Artington is the quickest (23 mins). This is the route that Sat Nav systems will direct drivers to take (route (D)). Route (C) shows it is also quicker to divert onto A3 rather than take the shortest route along the A31 (25 mins). The other option (Route (E)) also shows it might be quicker to divert off the A31, travel to Compton and cut up Down Lane to rejoin the A31 just to the east of the proposed access to the Blackwell Farm development.

Egerton Road/Gill Avenue access - impact on SRN

Any change that gives greater priority to the Egerton Road/Gill Avenue access/egress will add to traffic in this congested corner of Guildford and result in traffic backing up onto the A3. Even if more capacity is added to the A3 through the proposed widening scheme (which is uncertain), the A3 would remain over capacity between the Cathedral roundabout and the A31 (see SHAR Figure 4.7 and Table 4.5). In fact, the impact could be even more severe as traffic flows across the two roundabouts reported in the SHAR do not include additional traffic generated by the secondary school and the new railway station at Park Barn (Annex 12).

The problem of additional traffic from Manor Park impacting on the A3 (and on emergency vehicles to the nearby hospital A&E unit) was a concern for the Planning Inspector at the 2003 Local Plan examination when the University sought permission to move back the green belt boundary in 2005. His report stated that the University must “confine the increase in traffic generation from the Manor Farm site to no more than 5%.” However, the traffic figures put forward by the University in 2003, which were accepted by the Inspector (and which showed the University development would put almost no new traffic demands on the local community) did not include projections for the park and ride.

Figure 17 - Journey times from Puttenham to Guildford Station - March 8, 2017 during morning peak

The University has not demonstrated that this 5% cap on traffic hasn’t been breached. The conclusions of the traffic assessment carried out by PBA in June 2013 (accompanying a planning application for a car park at Manor Park) are not valid as:

1. The traffic assessment was carried out outside term time
2. The decision was made to disregard certain journeys from the final figures.

Egerton Road/Gill Avenue access - impact on LRN

Any change that gives greater priority to the Egerton Road/Gill Avenue access/egress will have an impact on the surrounding road network on the west of Guildford, adding to existing peak hour congestion on Egerton Road, Gill Avenue, the A323 and on residential roads throughout Onslow Village, Park Barn, and Westborough.

Recent proposals to upgrade the Egerton Road roundabout and to introduce a rail halt at Park Barn (Policy A59) would offer some relief, but this is unlikely to be sufficient to mitigate against the impact on the road network from up to 1,800 homes, two schools, a local centre, an extended business park, a new railway station, and potentially all the additional traffic accessing the University and hospital from the west. Furthermore, under the Plan’s proposals, the capacity of the road network itself will be reduced by the need for a new bus lane/cycle lane (which would have to share road space through pinch points such as the A3 underpass).

It is evident that the Egerton Road junction would not be able to cope with traffic volumes from the Blackwell Farm development unless:
1. A link to the A31 was provided,
2. Rat-running along this link was discouraged through the introduction of some kind of “control” (A26 Infrastructure Requirement (3)), and
3. The A3 was widened.

Details of how GBC plans to control this link are not provided, but it questionable whether SCC would introduce any control on a public road. It is probable, therefore, that the proposed “controlled section” would remain in private hands, and its ongoing maintenance and policing would rest with the developer(s). This is a far from reliable solution and there is a strong risk that measures to control the route would be subsequently abandoned due to its impracticality or due to funding not being forthcoming. This would have serious consequences for users of the road network on the west of Guildford and particularly for the emergency vehicles trying to reach the adjacent Royal Surrey County Hospital. Ambulances already struggle to cross this roundabout at peak hours (Figure 18).

[Figures 18 (a), (b) and (c)] - Blue light ambulance impeded by traffic at Egerton Road roundabout during morning rush hour on April 26, 2017. Traffic crossing this roundabout will increase as a result of the Blackwell Farm development.

[Figure 19] - Queues of traffic at Tesco roundabout cause tailbacks along The Chase and past Queen Eleanor’s Junior School during morning rush hour, as well as queues along the A3 and A31.

**Conclusion**

The deliverability of the Blackwell Farm PDA depends on the provision of significant road infrastructure: the widening of a section of the A3 from the A31 to Stoke Roundabout; and a new access road from the west.

No business case has yet been proven for the widening of the A3 and HE has made it clear that the scheme is uncertain. It would therefore seem that the site is both “undeliverable” and “undevelopable” and runs counter to the NPPF (para 47, footnotes 11, 12).

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.” (Footnote 11)

“To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” (Footnote 12).

The new western link road, upon which the site also depends, will slice through the Surrey Hills AONB and an Area of Great Landscape Value (which comprises historic parkland). It will also pass through, or very close to, a belt of ancient woodland (now acknowledged as a key consideration (Policy A26 key consideration (3))) and a scheduled ancient monument. In order to justify this level of environmental and landscape harm, GBC would need to demonstrate that the need for this new road outweighs this damage and that the road itself was practical (in terms of its impact on the surrounding road networks) and economically viable (NPPF para 173). GBC has demonstrated neither in this version of the Local Plan.

Resorting to untried and potentially unworkable measures, such as controlling part of what would become a major route into Guildford (A26 – Infrastructure requirement (3)) in order to take land out of green belt and force through development would be questionable in any circumstance, but to adopt these measures in order to force through development in the setting to an AONB, in an area that is also an AONB candidate area, is bad planning and suggests that decisions are being made based on who owns the land rather than its suitability for development.

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

**Attached documents:**

- **Annex 9 - correspondence M Furniss and F Curtis.pdf** (61 KB)
- **Annex 2 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf** (6.0 MB)
- **Annex 10(b) 2016-07-04 ISSUE (10).PDF** (2.4 MB)
- **Annex 3 - correspondence P Blake and K Stevens.pdf** (89 KB)
- **Annex 6 - GBCS Feedback Local Plan (Dec 14).pdf** (2.4 MB)
Comment ID: PSLPS16/1200  Respondent: 8729313 / Lisa Wright  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Overall the proposals are unsound as the road will plough through AONB to the South and road 2 will cut up existing Ancient Woodland.

Greenbelt and Countryside study flawed and made to fit as per developer wishes. Ditto SHMA figures.

No cooperation with Rushmoor or Hart District Council ref traffic impacts from the West.

OBJECT- AONB setting. also new assessment commissioned by Worplesdon, Compton and Wanborough Parish Councils says the whole of this area should be reclassified AONB. Surrey Hills AONB and Natural England for some strange reason did not include Blackwell Farm in their own AONB review, they chose to exclude it.

OBJECT- All Land currently classified Greenbelt and AGLV.

OBJECT. More cars along Egerton Rd /Gill Avenue which is already gridlocked. A&E dept access problems for ambulances.

OBJECT- Road and housing destroying Ancient Woodland.

OBJECT, Surface water will increase flooding at Wood Street Village and Fairlands (who already have an issue with rising sewerage when it rains heavy)

OBJECT, protected species both animal and plant will be destroyed. Skylarks, Newts, Kites, Orchids etc etc

OBJECT, Working Arable Farmland should be protected so we can feed ourselves.

OBJECT, Historical importance of Henry 8 Deer Park, features still visable.

OBJECT, Surrey Research Park isn't full now, has empty units and acres and acres of unused space. Other office facilities in the area are also vacant.

OBJECT to the increase in Air pollution in the area. Destroying the plants that currently help to clean our air and then building 1800 houses with all the emmissions AND car pollution is a doble whammy for the West of Guildford. We already have high air pollution in this area.

OBJECT to urban sprawl

OBJECT to merge of Guildford Urban area with Wood Street Village

OBJECT to sacrifice of Arable land for SANG.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2284  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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 any building on this Greenbelt, AGLV and AONB.

Residents and the wider community have not been listened to and most of the objections to this site have not be addressed, primarily the protection of our designated greenbelt, AGLV and AONB.

An independent assessment of the whole site, commissioned by Worplesdon and Compton Parish Councils shows that the site warrants inclusion into the AONB. This has been completely ignored. (strangely, the council excluded these particular fields from the AONB review list to be assessed by their own chosen consultant last year).

3, I object to further expansion of the Surrey Research Park when the current business park is not being fully utilised. There are still 'plots' which haven't even been built on yet, while other units are still vacant. The existing park is covered in surface car parks which could be built over. The lack of efficiency with the current Research Park with large unused space is criminal. There is huge traffic congestion throughout the local area impacting the Hospital, A3, Park Barn-tailing back to Worplesdon, Tesco roundabout and of course, the business park itself. Doubling the traffic from a whole new business park would double the congestion and severely impact our Hospital. The only access road would have to be cut through a section of Ancient Woodland (they've already started the road access). A joint traffic study commissioned by Worplesdon and Compton Parish Councils has shown an increase in traffic queues and congestion along the A31 and A3 which currently are gridlocked in rush hour.

9, Surrey County Council have already stated that there is no need for a further secondary school in this area. The nearby 'Kings College' is historically under subscribed and has ample room for expansion should it be required.

ref Infrastructure.

note 1,

I object to another major road, serving 1800 homes and a new business park being added to The Egerton Road/ Gill Avenue area. It is currently one of the worst congested road networks in Guilford, always at a stand still every morning and evening with people trying to access the Research Park, University, Hospital, Tesco and the A3, the road has no further capacity. In particular, I am concerned about Hospital ambulance access, rising pollution levels and road accidents. I am also concerned that the this new road will serve as a cut through from everything North and West trying to bypass Guildford itself (which is a nightmare any day of the week or weekend).

I also strongly object to the impact on the current Ancient Woodland and adjoining SNCI Commons, this road will cut a gaping hole through a very important wildlife corridor.
Furthermore, I object to the proposed route coming off the A31 into Blackwell Farm as it will significantly impact the beauty of the Nationally protected AONB and have a detrimental affect on the arable land, large native trees and wildlife in the area.

I object to the University and GBC statement here. The proposal of 'controlled access' to the Blackwell farm site is completely unworkable. Aside from the fact that no working model of a large scale housing estate with ANPR or similar can be found (because it doesn't work), how can we possibly police this type of situation? Will the taxpayer have to pay to monitor this site?

The sustainable Movement corridor does not work on this site as it is very hilly, the average person will be unlikely to want to either cycle or walk up this steep hill. I object to Green Belt land being used for this purpose.

Who is providing this bus network? Has Surrey County Council agreed to provide these services? We have recently seen our local bus network in Worplesdon being shrunk as it is not profitable for the bus companies to run the services. Buses do not work, people like to drive!

Note 10. Primary provision is available in Park Barn and I therefore object to the building of a new school on this site.

Note 11, SCC has no need for extra school capacity in West Guildford. I object to this clause being added at this point to try and 'sweeten' the development, it is irrelevant for this Local Plan document.

Note 22. I object to this. As already stated, the current Business Park has empty units, unbuilt plots and acres of unused land (which was taken from the greenbelt in 2003). There is no supporting evidence to warrant a further Research Park.

In Addition, these issues are missing from the proposal, have not been addressed and should be noted;

There is no statement of special or exceptional circumstances to warrant taking this land out of its protection and this should be divulged ASAP so we can make informed decisions.

Air pollution is very high in this area as shown by recent Guildford reports, I am very concerned about the current levels and I object to this development as it will dangerously increase that pollution and subsequent health of our communities. I already have a friend that was forced to move from the area to Scotland to avoid air pollution!

This farmland includes some of the best arable land at grade 2 and 3 and should be preserved for farming.

There is no mention of protected species, skylarks, bats, badgers etc and I object to their destruction.

Flooding is a serious problem in Worplesdon, this development will increase those problems.

This document is not Legally Compliant as disregards various policies of the NPPF, which include but are not limited to, the protection of the views to and from an AONB, the protection of our best and most versatile Agricultural land, Greenbelt protection etc etc.
This plan is not Sound as this site A26 has so many environmental, traffic, flooding and financial issues it is unlikely to be built within the plan period or at all. It is unlikely with all the mitigation required that the site will offer any form of affordable housing after a viability calculation.

This plan fails the Duty to Cooperate as it has not considered our neighbours in Rushmoor who have a huge development proposal for thousands of houses, most of which will rely on the A31 and A3 as their major transport links. Furthermore, Waverley sites such as Dunsfold which also have a huge impact on the A31/A3 junction have not been assessed for their additional impact.

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

Attached documents:

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We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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We 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:

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- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/1729  Respondent: 8735841 / Joanna Fenning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:
• Destroy views from the Hog’s Back ridge0 a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

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

Attached documents:

Comment ID: pslp172/1588  Respondent: 8742369 / Evelynne Gunn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/1766  Respondent: 8768353 / Roger Hall  Agent:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution.

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

Attached documents:

Comment ID: pslp172/412  Respondent: 8768417 / Casper Gorniok  Agent:

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/2071  Respondent: 8768673 / Maureen Worley  Agent:

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

Attached documents:

Comment ID: pslp172/481  Respondent: 8768673 / Maureen Worley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/548  Respondent: 8772449 / Pamela Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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- 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 for Nitrous Oxide.
Hi Neville. My computer is playing up—I hope that you can decipher my objections to Blackwell farm being built on. Apart from having a town being built on attractive countryside—there is absolutely no sense in increasing traffic to Guildford’s roads. As everybody knows the roads here cannot take any more traffic as they are at standstill much of the time. Why does Guildford need 1800 new houses? Just to satisfy The University’s greedy ambitions attracting more and more foreign students. The more foreign students we train—the better their work force will be in the future—to the detriment of our work force. So should we be keen to attract too many foreign students here?

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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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  local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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Comment ID: PSLPS16/1238   Respondent: 8806849 / Roland McKinney   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Object to the choice of this site.

It is a green belt site, close to areas of AONB and GLV, and new roads would cut through these areas. This area should
have been incorporated in its entirety into the AONB or at least into the AGLV. The views across this land down into
Guildford Town and from Guildford centre to the AONB are among the most iconic in the borough. to destroy them
would be municipal vandalism on an enormous scale. This site includes high quality agricultural land that should not be
developed.

Building on this area would cause great harm to the green belt and this is considered in more detail in the attachment, as
is sustainability.

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

Attached documents: Site objection.pdf (617 KB)

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Comment ID: pslp172/464   Respondent: 8806849 / Roland McKinney   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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 sites 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
• 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 for Nitrous Oxide.
• We object

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

Attached documents:
I am writing to object to the development of a 1800 home development and a new business Park on the beautiful Blackwell Farm. Apart from the stunning views that the Hogs Back provides, the area is classified as the Surrey Hills, which I believe is a ANOB and should be protected. The wildlife of which there is many would be destroyed and the additional traffic would be a nightmare. The area does not have the infrastructure for this development. It should be on brownfield land and it would destroy tourism who like to walk in the area. I totally object to this development.

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

Attached documents:
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- adds to air pollution in neighbouring areas, which already exceed 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: pslp172/1762  Respondent: 8820449 / B E Lennox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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- adds to air pollution in neighbouring areas, which already exceed 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: pslp172/5079  Respondent: 8820481 / David O’Connell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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

Attached documents:

Comment ID: PSLPS16/6319  Respondent: 8826529 / Martin Barker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I would also point out, with relation to Site Allocation A26, that the objection comments made in my 16/9/14 submission in relation to Site 60 are still relevant even if the details of the proposal have been somewhat amended.

SUBMISSION dated 16/9/14:

All points listed should be treated as Objections to the Plan

1. In the Foreword to the Plan, page 7, Monika Juneja states that “We have sought to select sites carefully and in a way which does not over burden any single area of our borough and ensure that the right infrastructure is in place”

I am a resident of Worplesdon parish in which I therefore take a particular interest. Worplesdon currently has 3577 dwellings. The proposed housing developments in Worplesdon are Blackwell farm, of which at least 1000 houses will fall within the parish, Fairlands (safeguarded) 773 houses, Liddington Hall 625 houses and Keens Lane 140 homes. This totals 2538 homes which would be an increase of 71% to housing in the parish. In a Green Belt area with only minor roads this is in direct contradiction to Ms Juneja’s statement and is without a thought for the local infrastructure which is already overburdened before a single new house is built.

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

Attached documents:

Comment ID: PSLPS16/8218  Respondent: 8826529 / Martin Barker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

1. Site 60 Blackwell Farm. 106 hectares of farming land to be used for 2,250 houses, offices, 8 Traveller pitches, school, shops, railway station and community facilities.

The land at Blackwell Farm fulfils all 5 functions of the Green Belt: (NPPF para 80)

• To prevent urban sprawl from London.
• To check the unrestricted sprawl of large built up areas.
• To prevent neighbouring towns merging into one another.
• To assist in safeguarding the countryside from encroachment.
• To preserve the setting and special character of historic towns.

Therefore for the above reasons and those below the development should be refused.

NPPF para 79 states that:

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

NPPF para 83 states that:

• “Once established, Green Belt boundaries should only be altered in “exceptional circumstances”
• “Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstance”

Part of this area to be built on is registered as an AONB. GBC would have to show “exceptional circumstances” in order to build on an AONB in the Green Belt. It would have a devastating impact on the AONB from an aesthetic and environmental perspective.

The site is located within 5km of Whitmoor Common - an SPA and SSSI - and forms part of a vital wildlife corridor linking Whitmoor Common with the Hogs Back via Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside Commons (SNCI)

The panoramic views from the Hogs Back form an important part of Guildford’s landscape heritage – you can see the cathedral from here.

There is an ancient woodland that would be affected by these proposals.

Blackwell Farm has many public footpaths and bridleways which offer extensive walking, horse riding and bicycling to local residents and visitors to Guildford.

The Hogs Back is the only steep, north-facing chalk ridge in the southeast and is home to some rare plant species and many protected animals and birds. There are a number of endangered (red list) species which inhabit the Hogs Back, including skylarks, little owls, yellow hammers and curlews.

Blackwell Farm is a working farm. It is good quality agricultural land. With the proposed increase in population in the South East there will be greater pressure on food resources so we need to protect our ability to provide food and crops for this country in the future years.

This land is formed of chalk and currently soaks up a significant amount of surface water. If it is developed and concreted over, this surface water run off would exacerbate existing flooding problems in Wood Street Village and Fairlands.

The A31 is already a congested road where it joins the A3 and an extra 5,000+ cars generated will make the problem worse.

It would be controversial to build roads across an AONB and an exit road through to the Research Park / Tesco roundabout would add enormously to the traffic congestion already experienced at this junction – the ambulances would not be able to get through to the RSCH.

Thames water does not have sewerage capacity to cope with a development of this scale.

In addition to all the above, no further development should be allowed by the University when they have not met their 2003 commitments relating to Manor Farm. They promised to have built 4,700 homes by 2011, yet even now they...
have only built 1,665 – that is a shortfall of 3,125. If those houses were built it would reduce your already inflated requirement of 13,040 homes down to 9,915. It would be a scandal should they be permitted to undertake further Green Belt destruction when existing permissions have not been taken up.

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

Attached documents:

Comment ID:  PSLPS16/8221  Respondent:  8826529 / Martin Barker  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site 109. Blackwell Farm. SANG

Blackwell Farm is a working farm. It is good quality agricultural land. With the proposed increase in population in the South East there will be greater pressure on food resources so we need to protect our ability to provide food and crops for this country in the coming years.

The land is ancient woodland and should not be disturbed.

The land abuts Broadstreet and Backside Common and therefore is an inappropriate and unnecessary place to site a SANG. We do not want artificially contrived SANGs when we already have natural common land nearby.

The public already has access to this land because of existing footpaths and bridleways.

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

Attached documents:

Comment ID:  pslp172/714  Respondent:  8826529 / Martin Barker  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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• 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]
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Site A26 Blackwell Farm

OBJECT. This is an appalling desecration of the AONB and its surroundings. It is good Green Belt (see Q3). The University should get on with the planning permissions it already has. However, the Surrey Science Park and the University expansion together with the re-positioning of the University playing fields (with any future floodlighting) and the proposed new university accommodation blocks on the present playing fields has already wrecked the view of Guildford from the Hog's Back. I am not sure the Blackwell Farm development could spoil the AONB more than it has already.

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

Attached documents:

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

**Attached documents:**
In light of this LCA it would seem to be prudent for any continued site allocation of this land to be qualified in the policy and supporting text to ensure that any development does not commence until completion of Natural England’s AONB Boundary Review and provided no part of the site is included within the AONB. The Plan should also provide for the development site allocation to be reviewed should the Boundary Review include any part of the site within the AONB.

Currently, no information is available for an AONB assessment to be made as to whether the proposed road access works and landscape changes proposed within the AONB would conserve its landscape and scenic beauty in accordance with Government policy. It would appear the works could damage the AONB significantly. If no sufficiently detailed drawings are available before the Local Plan EIP and an opportunity is given for a proper assessment to be made of the landscape implications, the Plan should make the allocation subject to the Council being satisfied, after taking advice, that no harm would be caused to the AONB, that no feasible alternatives are available or that any harm would be outweighed by the planning benefits arising from the proposed development of the site.

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

Attached documents:

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Comment ID: PSLPS16/3842  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

4. Objection 3 - Blackwell Farm site allocation

The Borough Council has reduced the extent of the site allocation for development of Blackwell Farm with the best of landscape intentions. The proposed vehicular access has moved from a high position on the Hogs Back that would have entailed significant engineering and road works and lighting within the heart of the AONB to a location on the edge of Guildford’s built up area and AONB. These changes are welcome but the revised proposed access creates new AONB implications.

At the time of writing no information is available as to the physical works within the AONB necessary to meet the substantial traffic flows to be the main access to serve the proposed development and provide an additional access for the Research Park and Hospital. It would seem that within the AONB there would be a new signals junction, new bridge over the A31 slip road onto the A3 and a new road running parallel and on higher land to the private driveway before crossing the drive to run parallel to it on the other and eastern side. The width of the bridge over the A3 would limit the scope for queuing lanes into the traffic signals junction and thereby its capacity. A roundabout might be better in highway terms but room does not appear to be available.

The works would involve substantial tree clearance and earthworks together with lighting at a high level visible in the wider landscape to the north. It would have the effect of extending the built up area of Guildford westwards. They would also open up to public view the proposed development from the A31 and those passing along the proposed new road having a degree of impact upon the setting of the AONB.

Government Planning Practice Guidance on Natural Environment – Landscape at paragraph 3 deals with proposals outside the boundaries of an AONB that might impact upon its setting. It refers to Section 85 of the Countryside and Rights of Way Act 2000 requiring councils, amongst other public bodies and persons to “have regard” to the purposes of AONBs. It goes on to state the following:

“This duty (to have regard) is particularly important to the delivery of the statutory purposes of protected areas. The duty applies to all local planning authorities, not just national park authorities. 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.”
The Surrey Hills AONB Management Plan 2014-2019 contains a similar policy as follows:

“Policy LU5 - Development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted.”

The Landscape Character Assessment carried out by Hankinson Duckett Associates in connection with Natural England’s (NE) proposed Surrey Hills AONB Boundary Review recommended a candidate area for possible AONB designation adjacent to the south west corner of the Blackwell Farm allocated site and west of the proposed access road. That would not only include landscape that they as specialist landscape consultants considered would meet NE’s latest criteria of natural beauty for inclusion within an AONB but in so doing would avoid the lack of any physical features the existing northern boundary line follows. That same latter thinking did not extend to the large rectangular field on the eastern side of the proposed access road north of the existing AONB boundary passing through the middle of an open field and abutting the southern boundary of the Blackwell Farm allocated site. Every prospect therefore exists that the inclusion of this northern part of the field would be included within the AONB in the Boundary Review. If that were to happen the whole of the southern boundary of the Blackwell Farm would abut the AONB and its allocation would further have to be considered against paragraph 3 of the Planning Practice Guidance on Natural Environment – Landscape, regarding not harming the setting of AONBs.

Since this draft plan was prepared the affected Parish Councils have commissioned a Landscape Character Assessment (LCA) of the area covered by the site allocation. Their consultant landscape architects assessed the allocated development site on the same basis that Hankinson Duckett Associates did in informing Natural England (NE) in preparation for the Surrey Hills AONB Boundary Review. They used NE’s latest criteria of “natural beauty” for inclusion in an AONB or National Park. The LCA concluded that much of the site should be included within the AONB in Natural England’s Surrey Hills AONB Boundary Review. Being published in May 2016 the LCA was unavailable to the Council in preparing this Local Plan and therefore is a change of circumstances that now needs to be addressed.

In light of this LCA it would seem to be prudent for any continued site allocation of this land to be qualified in the policy and supporting text to provide for any development not to commence until and provided NE do not include any part of the site within the AONB in its final Boundary Review. The Plan should also provide for the development site allocation to be reviewed should the Boundary Review include any part of the site within the AONB.

Notwithstanding the concern expressed above about the excessively high level of development growth, the plan has a built in buffer for some allocated sites, possibly including Blackwell Farm, to be later deleted if included within the AONB or at least not come forward for development during the plan period.

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

Attached documents:
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/4061  Respondent: 8831649 / Roy Chapman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/1131  Respondent: 8833857 / Gail Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to this proposal. This development is wholly inappropriate in the greenbelt.

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

Attached documents:

Comment ID: PSLPS16/7243  Respondent: 8839041 / Jon Maslin  Agent:
I object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
- Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in ‘Guildford urban area’ and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

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

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Comment ID:  PSLPS16/7244  Respondent:  8839041 / Jon Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to policy A26 Blackwell Farm.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - ‘checking the unrestricted sprawl of large built-up areas’. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its
landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 ‘assists in safeguarding the countryside from encroachment’ - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - ‘assists in urban regeneration by encouraging the recycling of derelict and other urban land’.

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion ‘hot spots’: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.
The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should ‘identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15’. In a footnote to this, it further adds, ‘To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.’ I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be ‘viably developed’.

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

Attached documents:
8) I OBJECT to Policy A26 Blackwell Farm

I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane. Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat).

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

Attached documents:

Comment ID: pslp172/3478  Respondent: 8839553 / David Burnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.
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The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, and Fairlands.

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

**Attached documents:**

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**Comment ID:** PSLPS16/2038  **Respondent:** 8839585 / David Foster  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

**Attached documents:**
Comment ID: PSLPS16/3746  Respondent: 8840897 / Clive Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Support for no development allocations within the Surrey Hills AONB except for the access road and junction to development allocated at Blackwell Farm. Also support for the Council's intentions to protect the AONB and AGLV that could be strengthened in the Plan.

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

Attached documents:

Comment ID: PSLPS16/8132  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: pslp172/5153  Respondent: 8845601 / Robert Burch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/5095  Respondent: 8847073 / V Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/994  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object.

It's a huge new development being proposed within 5km of the Thames Basin Heaths SPA, and therefore it is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

It's partly within an Area Of Outstanding Natural Beauty and Area Of Great Landscape Value (NPPF 116).

It's largely agricultural land, which is an important national resource for food provision, and will become increasingly so, the loss of which the government is supposedly keen to minimize (NPPF 112).

It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It houses endangered species.

It has huge amenity value.
We 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:

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- result in rat-running through local roads
- add to Guildford's pollution.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3026  Respondent: 8854785 / Desmond McCann  Agent:

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

I object to the hiding of development by "deferment" (A24, A25, A26, A43)
This version of the Plan has concealed some development planned to take place by "deferring" it beyond the period covered by the Local Plan. This is designed to have 2 effects:
I) to hide the number of housed actually being built (A24, A25, A26 - total of 1100 deferred, but still being built!) , and
ii) give an excuse for building houses on another site (A43 - 400/650 houses proposed) when they are not needed.

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

Attached documents:

Comment ID: PSLPS16/1124  Respondent: 8855201 / Catherine Harding  Agent:

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

Greenbelt - This is an urban extension and is an inappropriate use of green belt land which is designed to prevent urban sprawl. It is also part of the ANOB and AGLV. It is an important view in this part of Surrey which should be preserved as a having important local amenity and historical value.

It is the Hogs Back, an ancient track way which joins another ancient route, the Harrow Way around this point.
It includes an area of **ancient woodland**, an area of ancient trees and endangered flora and fauna including reptiles and red and amber list birds including red kites and little owls. The ecology of this area will be irrevocably changed and damaged by increased numbers of people and buildings.

This is **prime farmland** which could be used for food production for our increasing population without the need for importation.

**Traffic Issues** - The current access points from the A31 are not suitable for a new development. New junctions would destroy part of the AONB and ancient trees which are part of the Down Place park land. Additional traffic on the A31 would make the road even more dangerous; there were 59 accidents here between January 2011 and April 2013.

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

**Attached documents:**

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**Comment ID:** pslp172/1212  **Respondent:** 8855617 / Roy Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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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:** pslp172/4929  **Respondent:** 8856033 / John Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**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? ( )

I object to the development at Blackwell Farm. 1800 houses is again Urban Sprawl. These houses would sprawl Guildford to the very edges of Wood Street Village.

Greenbelt destruction should not be allowed when there are other viable options.

These options include:

Brownfield sites:

Town centre development:

Student accommodation on campus; not as they do now destroying homes in the town but freeing them up for families.

High rise student accommodation on campus. Much more effective and suitable for students.

Medium rise town centre development with affordable apartments.

Constraining the housing number with regard to lack of Infrastructure, retention of all Greenbelt, Pollution.

Reviewing the Housing Number. Brexit must reduce the number, potential reduction in Growth must reduce the number.

Going back and establishing a realistic, sustainable Housing Number based on what is achievable within constraints. i.e. 250 houses / year.

If there was a high demand currently, why haven't all the sites with planning gone ahead?. Lack of resources to build or lack of demand, or perceived risk by the Industry ?

I believe that setting a high Housing Number is very dangerous. When that number isn't met due to lack of resources or willingness to build by the industry, how will GBC deal with planning applications from sites outside the plan from other developers.? It is better to set a realistic Housing Number now rather than one based on fiction.
I objected to the previous plan in some detail. The new plan seems to have completely ignored my comments and I believe the comments of a vast section of the community.

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: PSLPS16/1869  Respondent: 8858113 / Ramsey Nagaty  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

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

Attached documents:

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Comment ID: PSLPS16/8019  Respondent: 8858113 / Ramsey Nagaty  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Blackwell Farm incorporates some of the most outstanding and beautiful countryside and ancient woodland, hedgerows and copses including the iconic view of the Cathedral rising from the countryside. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.
• Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

• Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

• Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge and the Iconic view of Guildford with the Cathedral rising out of the countryside). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.
The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. We question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The University in their submission to the old South East Development Agency in 2006 -2009 stated that a road linking the A31 to the A3 through Blackwell Farm would not relieve traffic but generate more traffic and bottlenecks and congestion. The University said such a road without the housing on Blackwell Farm would not work and with the added traffic of housing on Blackwell Farm would just cause Gridlock.

The University at that time stated no development except perhaps some minor extension of the Research Park and additional student accommodation and limited housing adjacent to the railway line to the north of the site could be considered. The University itself pointed to the AONB, The AGLV, the iconic views including that of the funeral and that nothing could be planned till the A3 was diverted or substantially improved.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

- This site comprises good agricultural land and is used for high grade farming to provide much needed food produce and is extensively used by local people for walking, jogging, rambling, cycling, horse riding and dog walking.
- I walk three times a day and often meet 20 or so dog walker 1, 2 and sometimes a line of many horse riders, cyclists, joggers and people walking having been advised by their doctors to do so and finding peace and comfort in the setting of Blackwell Farm. All comment on the beauty, tranquility and nature of Blackwell Farm and especially the abundance of wildlife and the scenic beauty. There are an abundance of permissive footpaths, old traditional paths some of which were public footpaths, as well as the Bridle path and Public Footpath and the grass strips around the fields.
- The University wildlife and environment study was greatly flawed and seriously affected by the farmer cutting the hedges and grass around the fields so destroying many of the boxes in the hedgerows and roofing felt squares that had been laid. The University census of users was flawed due to the census operatives expressing an aversion to dogs so not stopping most dog walkers and I myself despite walking 3 times a day on Blackwell Farm never having come across the interviewers. Strangely their report is unavailable from the University who claim, despite commissioning it, they have not received it!
- I was present 10-13 years ago when the University consultants Terence O’Rourke stated at the GBC Council moving the Greenbelt boundary allowing the University to build on Manor Farm meant the new boundary at Blackwell Farm would be permanent giving a minimum guaranteed 25 years. The same consultant speaking of the University new plans for Blackwell Farm in 2015 to the Guildford Society repeated this claim for a new Greenbelt boundary to allow development on Blackwell Farm, Hogs Back stating such new boundary would be permanent for at least the next 25 years. Quite hypocritical.
- The amount of run off of surface water from the Hogs Back fills the chalk pits making them unsuitable and dangerous as SANG. The risk of flooding and the need for provision of tanks and other measures to cope with the extensive surface water which creates streams through the fields and will be worse with roads and building on the land.
• The site is home to an abundance of wild life not used to roads, these include badgers, deer, owls, red kite, kestrel, yellowhammer, buzzards and even what people who have seen it can only assume is a racoon.
• The site lacks access and the plan to utilise a private road which does not have the approval of the main rights of way and stake holders in the road is a last resort after all other options failed to be realisable despite the University attempt to utilise bridle paths or a roundabout on the top of the Hogs Back which had too steep access and would have required 24 hour lighting unacceptable to the Surrey Hills Board. So a road with a single vehicle at a time, weight restricted bridge or possibly one parallel requiring a new bridge and cutting up through the AONB is now proposed. This would come out onto the A31 just after the kink as the dual carriageway becomes single lane two way traffic. This creates a blind spot both for cars leaving the site and cars driving into Guildford. The A31 and the bridge over the A3 would need to be widened. It just is not feasible.

Traffic is queuing down the A31 into Guildford most days from 7.00 to 9.30 so residents would find access restrictive with the proposed road network for the development. The proposed road would be steep and at times of the year be unpassable unless by 4x4 due snow and ice as we find with our existing road 3 or 4 times a year.

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

Attached documents:

Comment ID: pslp172/4303  Respondent: 8858113 / Ramsey Nagaty  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

POLICY A26 BLACKWELL FARM

20.1 - I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. I further object to the additional 300 houses for construction later on.

20.2 - There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

20.3 - Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

20.4 - The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

20.5 - Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

20.6 - The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the
north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension of the Research Park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

20.7- The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,500 increasing to 1,800 homes, two schools, shops, medical centre and an extended business park.

20.8 -The new road proposed would be inadequate for the volume of traffic and the University do not have the approval of those holding the rights of way on this road, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

20.9- The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

20.10- The proposed development will have an adverse effect on the wildlife, rare and protected birds and mammals etc.

20.11- Blackwell Farm and the Manor Farm land not already approved for development, is an area of significant landscape character (comprising AONB, AGLV, Green Belt land and ancient woodland) and development should not be allowed on any part of this land
- The parcel of land includes AONB and AGLV, and therefore has to be built upon only as a very last resort (and only in special circumstances)
- The strategy put forward in GBC’s own Landscape Character Assessment (2007) supports this view, yet little is made of the AONB/AGLV designation in the Green Belt and Countryside (Pegasus) Study.
- The fields within the site that are not AONB/AGLV-designated form the remarkable open views that can be seen from the AONB and therefore make the AONB what it is. They form the views in and out of the AONB and should also be protected as per NPPF.
- The whole site forms the panoramic vista from the top of the Hogs Back – a historical and geological feature which contributes to Guildford’s special character. This, too, is recognised in the Landscape Character Assessment, which describes the Hogs Back as the ‘iconic spine to the borough’.
- The Hogs Back forms important part of Guildford’s landscape heritage and the views from the top of the ridge are fundamental to the character of Guildford
- The site in question forms the views from the Hogs Back – an important part of Guildford’s landscape heritage. This is recognised in Guildford’s Landscape Character Assessment (2007), which describes the Hogs Back as the “the iconic ‘spine’ to the borough and rural backdrop to Guildford”.
- The Hogs Back is the road with the longest history in England – carrying tradesmen and pilgrims for centuries. It was used by worshippers travelling to Stonehenge; Phoenician, Greek and Gaul traders; Julius Caesar on his way to London; William the Conqueror on his way to Winchester; and thousands of pilgrims, including Henry II, who made their way along, and beside, the ridge towards Canterbury.
- Writers such as Daniel Defoe and Jane Austen, among others, have marvelled at the beauty of the landscape that can be seen for miles in all directions from the Hogs Back.
- The whole area is rich in history, Blackwell Farm was one of the very earliest model farms and Down Place is believed to have been landscaped by Capability Brown.

20.12- Development of Blackwell Farm and Manor Farm will be at a huge cost to the environment
The site is great amenity for the people of Guildford – it is used by walkers, joggers and cyclists, as well as by microlite and acrobatic-aircraft enthusiasts.
There are beautiful hedgerows with a variety of plants, old trees, ponds supporting all forms of wildlife. There are rare
species of wild flowers, including pyramid orchids. There are deer, foxes, rabbits and snakes (adders, grass snakes and slow worms). There are badgers, stoats and weasels, and field mice. There are buzzards, kestrels, owls, pheasants and woodpeckers. There are also skylarks, yellow hammers and little owls, which are all endangered.

The ancient woodland, which won’t be built on under the proposals, will be completely surrounded on all sides by development and will change in character as the inhabitants of 1,800 homes will cut through the woods as a shortcut to Tesco. Blackwell Farm is prime farmland – the UK is placing ever more reliance on imported food and every field concreted over will be another field of food to be imported at greater environmental cost.

20.13 -Inadequate Infrastructure
Infrastructure is inadequate to support the development Infrastructure changes should come before, or at least alongside, plans for new housing developments. There should be a master plan for the phased development of infrastructure (ideally including an A3 tunnel through Guildford, which would also help to alleviate the housing shortage as houses could be built over it). The west side of Guildford is already plagued by traffic problems and a 1,800-home development would exacerbate these. The existing road network would not be able to accommodate a further 3,000 vehicles entering/leaving Guildford from/to such a development either along the Hogs Back or via Manor Park. Peak-hour congestion on the A3 itself is set to get worse, and sending traffic through Manor Park would potentially impede ambulances travelling into, and out of, the Royal Surrey County Hospital. There is no gas pipeline to the area, and no mains drainage either. There are also reports that Thames Water does not have the capacity to provide water to 1,800 new homes in the area. Any development on Blackwell Farm and Manor Farm is on the wrong side of the A3, which forms a physical divide between the existing town and any new development. Any journey from the new development to the nearest school (in Park Barn) involves crossing over the A3 twice. Firstly over the bridge on the A31 (top of Farnham Road) and secondly back under at the Surrey Research Park. A 1,800-home development would put pressure on existing public services (schools, as well as medical and dental practices) and it is unlikely that the revenue raised from the additional council taxes would be enough to pay for another school.

20.14 -I strongly object to development at Blackwell Farm as when the University were granted permission to build on Manor Farm at the last Local Plan in 2003, it was agreed by the University and GBC that Blackwell Farm would be made into a Country Park for the residents of Guildford with a Nature Trail for School Children. The University and their Planning Consultants stressed that with the Green Belt Boundary change in 2003 no further development and movement of this new boundary would take place for at least 25 years.

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

Attached documents:

Comment ID: pslp172/5131  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:
I'm writing to express my strong objection to site allocation A26 (Blackwell Farm). My main concerns are for the effect that a development will have on the AONB and the effect that the development would have on an already extremely congested area of Guildford.

I'm sure you are aware that an independent landscape evaluation study for Blackwell Farm has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). For this reason alone, the land should be left untouched by the Local Plan.

Guildford is already extremely congested and the 3000 or so additional cars that would come with an out of town development has not been considered and would bring Guildford to a standstill.

This site was strongly objected to in the last round of consultation yet it still remains in this plan. I urge you to reconsider and withdraw this area from the plan. The Green Belt was eroded by the last Local Plan, it cannot be eroded further this time.

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

Attached documents:

Comment ID: pslp172/4881  Respondent: 8864225 / Patricia Tye  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/5143  Respondent: 8877601 / D Pollard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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:

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- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/5059  Respondent: 8877697 / Moira Newman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/2035  Respondent: 8877985 / Averil Garman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

**Attached documents:**

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**Comment ID:** PSLPS16/5898  **Respondent:** 8878689 / E McShee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

**Policy A26** (Page 182) – Blackwell Farm, Hogs Back, Guildford.

**I object:** the majority of this land should be designated AONB. Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village, particularly Pound Lane, which already has flooding issues at its junction with Oak Hill/Wood Street Green and Baird Drive.

The current infrastructure would not cope with the additional traffic caused by additional traffic.

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

**Attached documents:**

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**Comment ID:** PSLPS16/3314  **Respondent:** 8880993 / Michael Sayers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We are grateful for all the work that has been put into providing the draft Local Plan. We consider it to have been undertaken thoroughly and commendably well, in the face of many different pressures – and including the unsuccessful efforts for a Local Plan in and around 2014.

We are also glad of this opportunity to comment on the draft. We ask that this response is taken fully into account as the draft Local Plan is considered further.

We are concentrating on the Blackwell Farm/Hog’s Back proposals, which also inevitably affect other parts of the Borough. We have lived in Manor Way, Onslow Village, since 1972.

We recognise the need for much more housing in the Borough, and especially small and affordable types of housing.

Regarding Policy A26, we fully acknowledge the restrictions proposed, particularly those proposed to limit the number of homes. We are especially pleased about the exclusion of the southern part of the site from the Proposed Submission Local Plan (except for the new access road). In our view, 1,800 homes is significantly more acceptable than figures like 2,000, 2,250 and even 3,000 plus -- which have been mentioned or proposed in recent years by certain parties.
Even so, we oppose such a large number as 1,800 houses and other properties being built on such a site. It is a site which has a major effect upon an AONB, and which is widely recognised for its beauty. It is highly visible, from many directions and to a great number of people walking and driving nearby, with the best views (from a long way off) towards the Cathedral. Some of the views from the Hog’s Back ridge would be seriously spoilt.

The whole site provides views into, and out of, the AONB; National Policy lays down that it therefore needs the protection afforded to the AONB itself. Additionally, Blackwell Farm should itself be included within the AONB, as demonstrated by the expert land evaluation study published last month.

We are also still disturbed at the proposal to take land out of the Green Belt. This would involve permanent loss of irreplaceable Green Belt land. It would also spoil an area of Great Landscape Value.

We fear that there would be a real danger of increased pressure for further development, in the area between the new road and development, on one side, and Manor Farm, on the other side.

If these proposals, and those at the Normandy/Flexford area, go ahead, we also have a concern that it would lead to Normandy in due course being joined to Guildford.

We are extremely concerned about the traffic access. Neither proposed access route is really adequate for the likely number of vehicles for the new village and for the already heavily trafficked locations. The tailbacks on the A31 would increase. Local roads, including several in Onslow Village, would be used as rat-runs. There would also be significant through traffic from the Hog’s Back to the Research Park and RSCH, spoiling the new village. These traffic problems are unlikely to be met by avoidance work. There are serious traffic problems in the area already, as is well-known.

One additionally fears that such a large building programme would affect low-lying areas a little to the North – especially bearing in mind likely climate change effects.

Such a large development on land, which has long been mainly farmed, would remove land which will really be needed for food production for long into the future. There are also concerns about the impact on wildlife, especially birds – as regular walkers in the area can confirm.

We also fear that over-development there would be likely to do harm to Guildford’s character.

Thank you for your consideration. If we can try to assist further, please let us know.

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

Attached documents:
We recognise the need for much more housing in the Borough, and especially small and affordable types of housing.

Regarding Policy A26, we fully acknowledge the restrictions proposed, particularly those proposed to limit the number of homes. We are very pleased that the number of houses proposed for that area has been considerably reduced from previous figures. We are especially pleased about the exclusion of the southern part of the site from the Proposed Submission Local Plan (except for the new access road). In our view, 1,800 homes is significantly more acceptable than the much higher figures which have been mentioned or proposed in recent years by certain parties.

Even so, we oppose such a large number as 1,800 houses and other properties – including a school (or two schools) – being built on such a site. Even with the reduced number, it would fundamentally alter that side of Guildford, from a lovely rural countryside into a suburban housing estate, sometimes causing (and having) severe traffic problems.

At present the area has good quality farmland, bounded by an AONB to its South, a Site of Nature Conservation Interest to its North, with an ancient woodland on its East and countryside to its West. The whole site provides views into, and out of, the AONB; National Policy lays down that it therefore needs the protection afforded to the AONB itself. Additionally, Blackwell Farm should itself be included within the AONB, as demonstrated by the expert land evaluation study published a year ago.

It is a site which has a major effect upon an AONB, and which is widely recognised for its beauty. It is highly visible, from many directions and to a great number of people walking and driving nearby, with the best views (from a long way off) towards the Cathedral. Some of the views from the Hog’s Back ridge would be seriously spoilt.

It would involve moving the permanent Green Belt boundary for the second time in under 15 years. We are also disturbed at the proposal to take land out of the Green Belt. This would involve permanent loss of irreplaceable Green Belt land. It would also spoil an area of Great Landscape Value.

Regarding traffic: the plan would require a new access road. Bearing in mind both the current considerable amount of traffic in most of the area covered, but also the new traffic created under the Plan, the new road would be inadequate – leading to demands for a wider road or another road. It would also endanger Wanborough and Wood Street Village. It could easily slow down emergency transport to the RSCH. It would have a knock-on effect on alternative routes around Artington and Compton, and Onslow Village. The new road would also go through the AONB and through an area of Great Landscape Value.

It is significant that the previous Local Plan included a 5% cap on traffic increases in the area – which has long since been broken. On outcome would be increased air pollution in neighbouring areas – which is already over the safe EU limits.

We are extremely concerned about the traffic access. Neither proposed access route is really adequate for the likely number of vehicles for the new village and for the already heavily trafficked locations. The tailbacks on the A31 would increase. Local roads, including several in Onslow Village, would be used as rat-runs. There would also be significant through traffic from the Hog’s Back to the Research Park and RSCH, spoiling the new village. These traffic problems are unlikely to be met by avoidance work. There are serious traffic problems in the area already, as is well-known.

One additionally fears that such a large building programme would affect low-lying areas a little to the North – especially bearing in mind likely climate change effects.

Regarding Policy E4, we consider that extending the Business Park would do further damage to existing traffic and environmental problems.

General: Such a large development on land, which has long been mainly farmed, would remove land which will really be needed for food production for long into the future. There are also concerns about the impact on wildlife, especially birds – as regular walkers in the area can confirm.

We fear that there would be a real danger of increased pressure for further development, in the area between the new road and development, on one side, and Manor Farm, on the other side.

We also fear that over-development there would be likely to do harm to Guildford’s character.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/841  Respondent: 8881249 / Kate Tate  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/2718  Respondent: 8881761 / Colin Phelps  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: pslp172/633  Respondent: 8881761 / Colin Phelps  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We 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 sites 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
- 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 for Nitrous Oxide.

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

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- adds to air pollution in neighbouring areas, which already exceed 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: pslp172/5112  Respondent: 8887553 / John Pidgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: PSLPS16/4893  Respondent: 8890753 / Jan Messinger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I also object very strongly to Policy A26 Blackwell farm being built upon. This is designated AONB and should remain the beautiful place it is. Lack of infrastructure and increased surface water would have an affect upon the area in which I live the Parish of Worplesdon.

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

Attached documents:
We 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:

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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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1.1 **We object** to policy A26 Blackwell Farm. 1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. 1.3 Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. 1.3.1 Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. 1.3.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. 1.3.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”. 1.4 Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. 1.5 Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more...
sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.1.6 The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.1.7 The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.1.8 GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.1.9 The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.1.10 The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.1.11 The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

Attached documents:
Objection to Policy A26; Blackwell Farm.

Unmet housing need is not a reason for building on the Green Belt. Exceptionality has not been shown. NPPF 87-89 refers.

This site is currently farmed. states that good agricultural land should be retained for food production. NPPF 112 refers.

Blackwell Farm is home to a wide variety of animal and plant species. Building here will harm biodiversity. NPPF 123 point 4 refers.

The Surrey Hills AONB will be damaged by a proposed new road. NPPF 115 refers.

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

Attached documents:

Comment ID: pslp172/1760  Respondent: 8894849 / Hazel Still  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/1450  Respondent: 8896257 / Sheila Bicknell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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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: pslp172/4912   Respondent: 8901793 / JR Barton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/3715   Respondent: 8901825 / Raymond Woolfson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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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<td>I wish to object again to the above site still being considered for housing under the amended Local Plan.</td>
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<td>Quite apart from the congestion both in terms of people and traffic that it will add to that part of Guildford I am at a loss to understand as to how this site (an AONB and an adjacent &quot;Area of Great Landscape Value&quot;) is even part of this plan. On the one hand at a national level the Government is saying that the Green Belt is being protected but the evidence at local level gives a lie to that. I swear that that if the Lake District or the Cornish Coast fell within the boundaries of Guildford Borough Council you would see it as nothing more than a suitable place to locate loads of houses. It's nothing more than vandalism - once it's gone it's gone and then you move onto the next site that you previously wouldn't have considered. Where does it stop? Will you only be content when Guildford, Farnham and Woking are one massive</td>
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conurbation? Proof positive that politicians whether national or local know the price of everything and the value of nothing.

And this from a Conservative administration - the clue is in the name - aren't you supposed to "conserve"!

It it goes ahead at a level of 1500 to 1800 houses you can double the amount of cars it will attract as households nowadays are invariably two car. You obviously think that this part of Guildford is not sufficiently gridlocked as it is in which case I suggest you try travelling in along the A31 between 7.30 and 9.30 of a weekday morning.

In addition, how can you be so sure of the figures as to the number of houses required? I note that the Government's Infrastructure tsar, Lord Adonis (a misnomer if there was one) once stated that Guildford is one of the towns that should double in size. When in Tony Blair's government he was also one of the leading advocates for the introduction & scope of tuition fees - a policy that he has now gone back on. If he can be wrong about that, then he can be wrong about other things, in this case the scale of development required locally.

I therefore urge you to think again.

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

Attached documents:

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Comment ID: pslp172/5046  Respondent: 8903937 / Kathleen Parsons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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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: pslp172/4830  Respondent: 8905377 / Bernard & Maureen Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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- 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 for Nitrous Oxide.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4820</th>
<th>Respondent: 8910337 / A Sacre</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

We 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 sites 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
- 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]
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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: PSLPS16/8049</th>
<th>Respondent: 8913889 / Penny White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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</tbody>
</table>

Surrey University has failed to implement previous planning permission for student accomodation in order to release properties back to the local people and yet now seems to have the money to want to build on greenbelt, blackwell farm, which again should not be allowed.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3431</th>
<th>Respondent: 8916673 / R Atkins</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
</tr>
</tbody>
</table>
I would like to 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,

1) 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)

2) directs more office space to an extended business park (Policy E4), which will increase peak time congestion, mainly around the hospital and will encourage rat-running through residential areas.

3) 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)

4) 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?

Attached documents:
I further object to Blackwell Farm being included in this Plan as a development site (Policy A26 & Paragraph 4.1.9) which:-

Disregard 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 which would only add to the current serious congestion of traffic in the area of the A3 and A31 and will affect existing residential areas. Currently in the morning peak traffic period there is severe congestion. This hospital is a Major Incident hospital and fast access must be maintained at all times.

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 (2.1.4a)

Adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

Another aspect that must not be overlooked is the fact that this is farm land. In 2015 the National Farmers Union expressed alarm that our ability to produce our own food and be self-sufficient had dropped from 80% in 1980 to 62%. This will drop to 53% by 2040. As world population grows there is no way that we should be building on good quality farm land. A recipe for disaster. Again you must listen to us.

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

Attached documents:
We 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 sites 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
- 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 for Nitrous Oxide.

We suggest the following changes:

- Amend the boundaries of the proposed development site to exclude areas of Area of Outstanding Natural Beauty identified in the landscape study.
- Reduce the amount of office space allocated to ensure it does not exacerbate congestion around the hospital and A&E.
- Update the traffic studies to reflect the impact of proposed development and consider alternative sites for the business park.
- Explore measures to mitigate air pollution in nearby areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As part of the Local Plan consultation, I would like to strongly object to the inclusion of Blackwell Farm (site allocation A26) as a potential development area.

This area is very beautiful and forms the views from an Area of Outstanding Natural Beauty on the Hogs Back.

If the harm to the landscape were not enough to prevent this development going ahead (and it should be) then the queues of traffic on the A31 in the morning certainly are.

I grew up on the Hog's Back and the whole time I attended Guildford County School, I had to sit in traffic every morning.

The whole idea of adding traffic from 1,800 homes to this queue and to the queues at the tesco roundabout is crazy.

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

Attached documents:

------

I object to the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1. 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]
2. 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
3. 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]
4. adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

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

Attached documents:
Policy A26 – Blackwell Farm

1. I object: to the housing numbers being reduced from 1800 to 1500 without GBC clarifying whether this reduction is due to Surrey University actually building student accommodation on their land for which planning permission was granted some years ago.

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

Attached documents:

Comment ID: PSLPS16/7674  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Blackwell Farm

I strongly object to any development on the Hogsback an AONB.

For very questionable reasons, a landscape assessment commissioned by Surrey County Council as part of the Surrey Hills AONB boundary review had omitted Blackwell Farm. However an independent study commissioned by Compton, Warnborough and Worplesdon Parish Councils concluded that indeed Blackwell Farm was very deserving of protection.

The land evaluation study, carried out by Land Management Services, an established firm of landscape architects, assessed the area using Natural England’s latest AONB criteria and found that nearly the whole of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary. The study also recommended that adjoining semi-rural areas on the western edge of Guildford, which did not meet AONB criteria, should remain undeveloped as they provided an important views into and out of the AONB.

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

Attached documents:

Comment ID: PSLPS16/285  Respondent: 8929921 / Caspar Hancock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

13) I OBJECT to the inclusion in the Plan of the site at Blackwell Farm, which will also contribute massively to the problems on our already choked road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPS16/4180  
**Respondent:** 8933185 / Peter See  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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


**Objection** - There will be too many homes (approx. 1,800). Too much land will be taken from the Green Belt for housing. Also, housing density will be too high. There may be exceptional circumstances associated with building on this Green Belt land (eg research facilities near to the University). However, the number of houses planned suggests that the Blackwell Farm site will be overdeveloped (in relation to its position between the Urban area of Guildford and the open countryside of the Green Belt).

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

**Attached documents:**

### Comment ID: PSLPS16/5817  
**Respondent:** 8935137 / Luke Gates  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

**Page 163**

I simply cannot support a plan that will destroy acres of biodiverse green space. As I walked along the bridleway yesterday, I watched three species of birds that depend on this habitat for local breeding and survival. It is not acceptable to damage these populations, they require protection.

There is a balance to providing a sustainable community for growth and protecting natural resources. In this case I firmly believe the plan is wrong and reiterate that I DO NOT support the plan and the Blackwell Farm development.

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

**Attached documents:**

### Comment ID: pslp172/3748  
**Respondent:** 8935137 / Luke Gates  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Please find this email as an objection to potential development at Blackwell Farm, under the Guildford Local Plan. As a local resident and passionate conservationist and educator I cannot support this proposed development at all.

Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1) It is home to a breeding population of nationally conservation sensitive bird species, including breeding populations of yellowhammers and skylarks. They are in decline and require protection LOCALLY.

2) It 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].

3) It 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.

4) It 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].

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

Attached documents:

Comment ID:  pslp172/5055  Respondent:  8939905 / Elaine and Christopher Sibley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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.
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID:  PSLPS16/7160  Respondent:  8941761 / FLGCA (Paul Kassell)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

FLAG objects strongly to this allocation for the following reasons:
  a) The area should be included as AONB, it is beautiful, defines the Hog's Back.
  b) The infrastructure will not support this site.
  c) Water run-off will run down and affect Wood Street and Fairlands

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

Attached documents:

Comment ID: PSLPS16/5360  Respondent: 8944897 / Beechcroft Drive Residents Association (John Robson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I strongly object to Guildford Borough Council's draft local plan proposals to build 1,800 houses, an industrial estate and a highway on the slopes of the Hog's Back at Blackwell Farm, for the following reasons:

  • Developing this site will destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
  • GBC have refused to undertake full due diligence on how the housing number has been generated by the SHMA. It is apparent that this has been generated in order to support central government housing policy. This therefore cannot be considered to be a plan that meets local needs.
  • The proposed housing number is based upon a certain percentage net migration, given that the UK proposes to leave Europe, this calculation methodology must be considered unsafe and should be recalculated.
  • The University will not deliver 40% affordable housing they will utilise the “economic viability” get out clause.
  • Development of this site will remove 72 hectares of scenic parkland and additional ancient woodland from the green belt
  • Even with the proposed widening of the A3, the current road network cannot sustain the additional traffic that this development will generate.
  • The University development of Manor Park was subject to a 5% traffic cap, this development will exceed this cap significantly
  • Even with the addition of an additional school, Guildford’s existing schools cannot accommodate the influx of children that this development will generate, they are already at 100% capacity.

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

Attached documents:

Comment ID: pslp172/972  Respondent: 8945089 / Linda Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/4961  Respondent: 8945793 / Helen Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/4958  Respondent: 8945825 / Kenneth Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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- adds to air pollution in neighbouring areas, which already exceed 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: PSLPS16/1888  Respondent: 8953857 / Robert Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

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

Attached documents:

Comment ID: pslp172/1317  Respondent: 8953857 / Robert Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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Surrey University has still to build the amount of student accommodation on its Manor Park Farm site that was agreed when planning permission was given in 2004. The site is big enough to create accommodation for some 7000 students and possibly many of its staff. This would free up something like 2000 dwellings and reduce the need to build more. I object to their request to build anything at all on the Blackwell Farm site - an AONB. Any planning application they submit should be denied until they have honoured their current obligations relating to the Manor Park Farm site.

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

Attached documents:
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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/8208  Respondent: 8957761 / Janet McFall  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

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

Attached documents:

Comment ID: PSLPS16/4921  Respondent: 8957953 / Mo Usher  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to site A26 Blackwell Farm being included in the strategy and sites consultation because it goes against both the National and Guildford Borough Council's own policies as follows:

- Policy D1: P93 Design - Making better places
  - In matching words to reality, this policy has a hollow ring especially in the creation of the proposed Garden Neighbourhood at Blackwell Farm. The harsh reality is that site 60 is not close to the centre of Guildford and transport is ESSENTIAL. Public transport in the area is always being cut back due to lack of funding or is unreliable. Therefore use of the car is the order of the day, as has been found on the envisioned car free campus of Manor Park, now covered in acres of car parking.
  - Development on the Hogs Back will destroy the local character of Guildford.
- Policy P1: P45 Protecting - Surrey Hills Area of Outstanding Natural Beauty

- Policy P1: P45 Protecting - Surrey Hills Area of Outstanding Natural Beauty
Forming part of the Hogs Back ridge Blackwell Farm is very scenic. By law Blackwell Farm should be given the highest level of protection. See NPPF

- **Policy P2: P48 Green Belt**
  - Located on the outskirts of Guildford on the slopes of the Hogs Back in an Area of Outstanding Natural Beauty and Area of Great Landscape Value, Blackwell Farm is GREEN BELT.
  - Guildford has already lost too much Green Belt already. It is our legacy not only for our future, but our children’s future.
  - Access to the Countryside
  - Nature conservation
  - This land is high grade agricultural land.
  - Growing our food locally is sustainable and with climate change, this will prove to be even more so.
  - See NPPF
  - Chalk Down is rare in Great Britain and needs special protection.

- **Policy D3: P103 Historic environment,**
  - Blackwell Farm contains many ancient hedgerows, some of which date back to Medieval times.
  - Most of the hedgerows are well over 200 years old.
  - The Hogs Back is part of one of the oldest roads in Britain.
  - It is high a quality environment
  - Development of Blackwell Farm will not contribute to local character and distinctiveness

Policy E6: P79 Leisure and visitor experience

- The visual impact as seen from the Hogs Back and the Down will be disastrous. This **visual amenity will be destroyed forever** as has already happened under ‘exceptional circumstances’ with the development of Manor Park.
- The Hogs Back is iconic and Guildford’s heritage.

- **Policy E7: P83 Guildford Town Centre**
  - As it nestles into the North Downs, Guildford already suffers from pollution levels in excess of acceptable levels. It is a perfect trap for pollution. Located in such close proximity, Blackwell Farm provides much needed oxygen for the town centre.
  - This tract of land is the lungs of Guildford. The loss of Blackwell Farm will have an impact on health on it’s citizens.

- **Policy 13: P113 Sustainable transport for new developments**
  - The development of Blackwell Farm with housing and an extension of the Research Park, which is a “nationally significant business cluster”, will bring a huge increase in traffic to an area which is already over- burdened with chronic traffic jams.

- **Policy 14: P116 Green and blue infrastructure**
  - See NPPF Paras 7, 99, 117, 156 with regards to Biodiversity, Wildlife corridors and Climate change
  - The area supports a great deal of wildlife which include deer, skylarks, and badger’s setts. It is one of the few sites remaining in the Borough of Guildford where badgers have been able to survive in the area.
  - It was always considered to be safe as it was Green Belt in an Area of Outstanding Natural Beauty.
  - There has been a dramatic reduction in wildlife since the Manor Park development.
  - Blackwell Farm is home for many endangered species.
  - It is well used by walkers, runners, dog walkers, and bicyclists

There are many areas in Guildford which need regeneration such as Walnut Tree Close and the Station instead of taking our precious Green Belt which is our heritage for the future. Vast areas of land are taken up with car parking especially at the University. With masterful town planning, students on campus and proper use of brown field sites, it could provide all the affordable homes required and a sustainable expansion of Guildford.
Furthermore in the light of Brexit, housing figures need to be reviewed and constraints put in place due to the Green Belt. Guildford is a gap town with a very poor road infrastructure.

The loss of Blackwell Farm will be detrimental to the quality of life for all who live in the Guildford area.

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

Attached documents:

Comment ID: pslp172/3115  Respondent: 8957953 / Mo Usher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I STRONGLY OBJECT TO POLICY A26 BLACKWELL FARM HOGS BACK, GUILDFORD BEING INCLUDED IN THE STRATEGY AND SITES. This goes against both the National and Guildford Borough Councils own policies as illustrated in my 2016 submission. The changes to the 2016 Draft Local Plan do not reflect this and I am disappointed that the Borough Council has not heeded the voice of the majority who are intimate with the area and have had to deal with the problems often on a daily basis.

Allocation
Clauses 1-10 This ignores an independent expert landscape study and independent exper traffic studies which have been submitted as evidence.

Requirements - Infrastructure
1. Independent expert traffic studies have been ignored
2. An independent expert landscape study has been ignored
3-5 Independent expert traffic studies have been ignored
6. The A26 location is a significant distance for walking and cycling
8. Independent expert traffic studies have been ignored 10-23 An independent expert landscape study and and independent traffic studies have been ignored

Opportunities
This ignores an independent expert landscape study and independent expert traffic studies

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

Attached documents:

Comment ID: pslp172/419  Respondent: 8958561 / C.J. & D Conway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: pslp172/492  Respondent: 8958689 / P Yarnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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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: pslp172/1798  Respondent: 8962177 / R Wetherill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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- adds to air pollution in neighbouring areas, which already exceed 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: pslp172/1303  Respondent: 8962497 / M Sadler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/1309  Respondent: 8962881 / D A Middleton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
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- adds to air pollution in neighbouring areas, which already exceed 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:  pslp172/4910  Respondent:  8966081 / Tanya Hebberd  Agent:

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID:  pslp172/1608  Respondent:  8966177 / Michael Bryant  Agent:

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

We 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 sites 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
The University supports the allocation of land at Blackwell Farm for mixed use development. The site is an exceptional opportunity to deliver a mixed use sustainable new community, taking advantage of its location on the western edge of the town of Guildford to deliver new homes next to both existing and new employment opportunities and with excellent non-car movement links. It has characteristics that are well suited to a high quality residential environment that integrates with the existing town and makes best use of the natural features on and around the site. The University firmly believes this is an opportunity not to be missed to plan positively and creatively, to make a place that the town and the University can be proud of.

The University supports the principle of providing urban extensions to Guildford as part of a sustainable development strategy. The level of the objectively assessed need in the borough is such that it cannot be accommodated only by using previously developed sites and sites within the existing urban areas. The strategy must include extensions to the main urban area in the borough so that homes are provided close to the existing employment, services and facilities in the town. There are no reasonable alternatives to meeting the local plan’s development strategy that do not involve extending settlements, and hence altering the green belt boundary. This is the basis for the exceptional circumstances that underpin the alterations to the green belt boundary through the local plan.

In this context the University firmly believes that the allocation of land at Blackwell Farm provides a significant sustainability benefit. It is large enough to provide a significant number of new homes and associated services and facilities, as well as to fund new infrastructure and improvements to existing infrastructure that will benefit the town.

In particular it lies adjacent to the existing large cluster of employment, services and facilities on the western side of the town leading to a strong likelihood that sustainable modes of travel will be used by new residents to access the existing employment opportunities, services and facilities as well as those to be provided on site.

The Blackwell Farm site is integrated with the western end of the town’s proposed sustainable movement corridor which further emphasises the ability of the site to provide new residents with realistic opportunities to walk, cycle or use public transport to go about their daily lives.

The successful Surrey Research Park is a major asset to Guildford’s economy but is now almost full as the last available development plots are being developed. The Blackwell Farm site provides potential for an extension to the Park to build on its economic success, which has been and continues to be an important element of the growth and prosperity that Guildford enjoys and will continue to enjoy with this extension. The ability to extend the Park is an important factor in support of the allocation of the site through Policy A26.
In addition, the University itself is a major asset to the town and borough, not just educationally and economically but also through the cultural, sporting and social opportunities and facilities it provides.

The University brings a wide range of benefits to individual students and to society as a whole through the quality of the education it offers and of the graduates and postgraduates it produces, as well as through the dissemination and practical application of its research.

However, like all modern universities in the UK, it is expected to provide more than just high quality higher education and research. The University is also an important and powerful engine of economic growth. It is involved in social change, and provides numerous opportunities for cultural enhancement. It is a leading institution in the local community, and its students and staff use many types of local services and businesses and add to the diversity of the area.

The University’s people, both staff and students, have a significant presence in volunteer work in the town and borough, supporting many parts of the community and being active in a range of community groups. Many graduates of the University bring their skills to the local job market (and indeed many more would also do so if the housing market was more affordable to young graduates).

Of course the University itself is one of the largest employers in Surrey. When combined with the Surrey Research Park, and looking at direct and indirect contributions together, the University and the Park contribute about £1.7 billion to the UK economy and support over 17,000 UK jobs (over 10,600 of which are in Guildford).

Many of the University’s facilities in the town are used by and valued by the local community for the educational, sporting, social and cultural opportunities they provide.

Given that Blackwell Farm is owned outright by the University, there is an opportunity to generate returns for the University, which will allow the University to reinvest receipts in its facilities, and hence in the town. There is currently and will be for the foreseeable future a constrained funding environment. The returns from development at Blackwell Farm therefore provide real potential to help the University to maintain its position and realise its future plans.

These plans include the potential for the University to:

- Replace and/or refurbish building stock. The University has about 73,500 sq m of non-residential space and about 1,700 bed spaces designed and constructed between 1965 and 1972 that require replacement or refurbishment over the next 20 year period
- Plan and build a new conference centre for the University and the wider community on land already with outline planning permission for academic and supporting development at Manor Park
- Accelerate the building programme for student residences at Manor Park. There is outline planning permission for about 2,000 bed spaces at Manor Park (subject to detailed planning) that are dependent on funding to bring them forward. The University currently has a live planning application for the next 900 beds, and is expecting the determination of the application at any point, although funding is needed to bring these forward and indeed for the next tranche up to the limit allowed by the existing outline permission
- Plan and build academic buildings on land already with outline planning permission for academic and supporting development at Manor Park. The University considers that this would help to elevate its international position and assist in positioning the University to join the Russell Group of leading UK universities, which are committed to maintaining the very best research, an outstanding teaching and learning experience and unrivalled links with business and the public sector.
- Plan and build academic buildings for satellite engineering, communications system engineering, a business school or school for Hospitality and Tourism, and a potential Medical School and other investment in biomedical sciences, to enhance core areas of the University’s strengths and further enhance its position internationally and in relation to Russell Group membership. Whilst Government policy is that higher education is a key priority for growth and there is Government support for universities and the encouragement of innovation, Government funding for this type of investment is declining and funding arrangements generally have become more complex. Revenue from academic fees and other sources is not guaranteed to meet the level of investment required to achieve the University’s aims in the areas outlined above. Alternative streams of funding are therefore important to securing the future of the University.
The University’s sole ownership of the site is also an advantage in bringing the site forward for delivery of homes. This sole ownership provides greater confidence of delivery. The fact that the University is also a world class Guildford institution, rooted in the town and the borough, with a significant stake in the future of Guildford, is very relevant.

It is important and significant that the University intends to retain control over the development and the land, providing long term stewardship, and acting as a trusted custodian of the land and the homes it will deliver, to control quality and future management of the site. This is in marked contrast to the usual developer-led housing model where the same level of control and long term stewardship could not be achieved.

Above all the University has three key delivery goals that reflect its place as an important part of Guildford now and in the future:

- Firstly, to create a place to be proud of, so that in the future, looking back, it can be seen to have been the right thing to do and matches the aspirations of the local plan
- Secondly, to create a place of high quality on the land neighbouring its campus and research park, so that it protects and enhances what has already been achieved
- Thirdly, to create a place of lasting value to the fabric and community of the town.

- A new access to the A31 will allow access to and from the Surrey Research Park and the Royal Surrey County Hospital directly from the A31 without joining the A3 and passing through the congested local highway network around the Tesco roundabout and Egerton Road junction. Indeed by diverting some of the A31 traffic it will help to control this congestion.

Good permeability for pedestrians, cyclists and public transport will further provide opportunities for reducing congestion as the new homes on the site can be expected to be particularly attractive to those who work at the University, the Surrey Research Park and the hospital, who will all be within walking and cycling distance of these workplaces, and on an excellent public transport route.

Occupants of the affordable housing in particular can be expected to be local people with local workplaces, particularly so if it is possible to secure some of the affordable housing quota specifically for University, SRP and RSCH key workers through the use of eligibility criteria based on a formula linking rent to salary.

This means that the development of Blackwell Farm offers the University the opportunity to provide tied accommodation for rent to young staff that come to Guildford on short contracts. The benefits are manifold; firstly it makes it easier to recruit the best staff to carry out research and teaching to the benefit of all, by providing housing that is affordable to these staff in a market that is generally not affordable to them. Secondly, it means these staff will not be competing in the open private rental market in the town, so reducing the pressure on this market arising from the University. Thirdly it means these staff will have their homes close to their place of work and thereby reduce commuting time and costs.

Some have argued that the University can achieve this through its existing outline permission for Manor Park. However, initial attempts to provide staff housing have not been successful as staff generally, and understandably, prefer to live away from the campus and the student residences, in more traditional family housing areas. Units built to date for staff at Manor Park are therefore generally lived in by students as staff have declined to take them up. This does mean of course that any staff beds at Manor Park have been reassigned to students so making full use of the accommodation available.

The details of the potential ‘tied’ accommodation scheme have yet to be worked out in full. This will need to consider matters such as the numbers of staff likely to be involved, the eligibility criteria and levels of rent, and the relationship of this tied housing to the affordable housing quota. However, what is clear is that it is unlikely to be possible to achieve this on a site not owned by the University, so it is a unique opportunity for this site.

All of the above means that Blackwell Farm therefore provides a significant opportunity to provide a truly sustainable extension to the town. For this reason Blackwell Farm should be the first site on the list of urban extensions around the town, to reflect its superior ability to provide sustainable development when compared with other sites.

The University has reservations about the methodology and conduct of the Green Belt and Countryside Study (GBCS), that has been used in the identification of sites for the plan. Leaving aside these reservations, the allocation of Blackwell
Farm is sound for good reasons relating to its lack of environmental constraints, highly sustainable location, availability and deliverability. However, should the study be debated at the public examination of the plan, the University would like to be present to put forward its views.

The University has additional land at Blackwell Farm that can provide additional capacity for development that should be allocated as safeguarded land to provide longer term flexibility and help meet future needs beyond the plan period without needing to alter green belt boundaries again. This lies immediately to the west of the draft allocation and will provide another 800 homes plus other facilities and services. This includes potential for a new secondary school to serve the western side of Guildford.

The University believes that the allocation of sites outside the existing urban areas should be predicated on their suitability to provide sustainable development opportunities to help meet the development strategy of the plan, rather than over-reliance of green belt scoring used in the analysis in the GBCS.

However, the University notes that its additional land is part of parcels H3 and H4 of the GBCS, which are adjacent to, and scored similarly to or better than (in terms of green belt sensitivity) parcel H2 that forms the basis of the draft allocation. Hence insofar as it is relevant, the GBCS scoring would support the potential of the land as safeguarded land.

This land, being adjacent to the new urban edge of the Policy A26 site, would be preferable to less sustainable sites in locations away from the town. It would also:

- Provide additional development in general that would increase the ability to contribute to funding of infrastructure improvements.
- Provide additional land that could be used to provide a new secondary school to serve the western part of town.
- Provide additional SANG.
- Provide additional biodiversity and public recreation access benefits,
- Provide additional local centre facilities, including a second primary school if needed.

The University attaches a map at Annex 1 that identifies the additional area (51.5 ha) to comprise the safeguarded land.

The University notes the requirements listed in bullet points associated with Policy A26. These are acknowledged and are being addressed in a masterplan being prepared for the site. Given the continuing evolution of the concept, a draft illustrative master plan has been submitted, in support of the University’s comments in this document. This shows the concept for the draft allocation. See Annex 2 to these comments.

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

Attached documents:
- 160718 156110 GBC Local Plan reps final version_reduced.pdf (3.2 MB)
- Annex 1 Current site A26 boundary and proposed safeguarded land.png (783 KB)
- Annex 2 Site A26 draft illustrative masterplan.png (1.3 MB)

Comment ID: pslp172/2484  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )
POLICY A26: Blackwell Farm, Hogs Back, Guildford

Allocation

1): The University notes the change to the text to refer to a minimum of 1500 homes being delivered in the plan period. We understand that this is not a constraint as it does not prevent the whole 1800 homes from coming forward in the plan period if the market and infrastructure provision allows. The University suggests this additional wording to clarify this:

“The total of 1800 homes may come forward in the plan period if the market and infrastructure provision allows”.

The University considers that there is potential for delivery to start from 2020 onwards. A revised illustrative masterplan is attached to these comments to show how the site might be developed.

3): The University supports the change from 31,000 to 30,000 sq m of employment provision. This is shown on the illustrative masterplan framework provided.

4): The University supports the change from 550 to 500 sq m of comparison retail, to be located in the local centre shown on the illustrative masterplan.

9): The University supports the addition of secondary school (6 forms of entry) of which 2 forms are needed for the site, the rest for the wider area. An indicative location for the secondary school buildings is included on the illustrative masterplan framework.

Requirements; infrastructure

1. & 2): The University supports the removal of references to ‘primary’ and ‘secondary’ access (so no access has primacy). The two access points and indicative routes into the site are shown on the illustrative framework masterplan submitted with these comments.

The University notes that the allocation boundary provides a narrow corridor for the access from the A31 but considers that at this stage this should be less definitive given that the detailed plans for the access have yet to be drawn up. The plan should provide for flexibility in the alignment of the access road and the new junction. The plan should show a broad zone through which the access will pass, subject to detailed design.

3): The University notes the addition of reference to the through vehicular access ‘which will be controlled’ for employees and emergency services. The University is content in principle to see a controlled access, but thought needs to be given to the nature of the controls being sought, and the mechanism. Without this the policy may not be effective. The proposed controlled through route is included on the illustrative masterplan framework accompanying these comments and is shown on the access and movement plan showing the key routes through the site.

The University notes the addition of a reference to a choice of vehicular access for new residents/occupiers. This needs to be considered in association with the ‘controlled’ access above.

The University notes that the through link is no longer to ‘provide relief’ on the A31/A3 junction, it is instead to ‘reduce impact’ on it. This change is supported and its benefit is acknowledged.

4): The University notes the reference inserted to a Sustainable Movement Corridor SPD, and that this document does not yet exist. The University looks forward to reading and commenting on a consultation draft of this SPD. The University supports the principle of this investment proposal.

5): The University notes the addition of text to require a significant bus network to serve the site and key destinations including the existing western suburbs of Guildford and the town centre. The University already provides/subsidises a number of bus services in connection with its campus, and this will be extended in an appropriate manner to the Blackwell site, in discussion with the bus operator and SCC/GBC. However, the words ‘significant bus network’ and
encompassing ‘existing western suburbs’ seem to imply something far wider. The University therefore suggests that the wording be changed to say:

“extension of existing bus services to serve the site and to link it to key destinations and the town centre”.

The University considers that the key destinations include the Surrey Research Park, the Royal Surrey County Hospital, the University (including Manor Park, the Surrey Sports Park and Stag Hill), Guildford railway station, and the town centre.

6): The University supports the new text that seeks to provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford. The revised illustrative masterplan (submitted with these comments) includes permeability proposals, comprising links between the site and the urban area as well as to the wider countryside.

10): The University supports the new text that adds a community building and playgrounds to list of supporting infrastructure. The revised illustrative masterplan (submitted with these comments) includes this provision.

The University supports the deletion of playing fields from the list of other supporting infrastructure to be provided on site, as this helps to make the best use of the allocated land for new homes. The revised illustrative masterplan (submitted with these comments) includes playing field provision off site adjacent to the development.

11): The University notes that secondary educational need will be re-assessed at the time a planning application is determined at which time any recent new secondary school provision will be taken into account. The secondary school will, however, be no larger than six forms of entry, as referenced in point 9 of the allocation part of policy A26.

This should be reflected in the text of this part of the policy, by addition of the words ‘The size of the school at this site will not exceed six forms of entry’.

The University supports that the associated ‘off site’ school playing fields must be dual use and secured through planning application. The attached illustrative masterplan shows the school playing fields off site adjacent to the development.

Requirements; other issues

22): The University supports the deletion of text that splits the employment floorspace over 2 parts of the site. The illustrative masterplan provides for this in one part of the site as an extension to the adjacent Surrey Research Park.

The University supports in principle the new text that states that both the existing Surrey Research Park and the new extension will be together treated as an Office and Research & Development Strategic Employment Site. However, it would seem unnecessary to include this in the policy text, which is already lengthy. Surrey Research Park (extended) is already in the list in policy E1, so this repetition in A26 is duplication and could be removed.

Opportunities

The three opportunities listed in this part of the policy do exist, and the University agrees with the principle of them. However it would seem unnecessary to include them in the policy text, which is already lengthy, given that some of these points are already covered in effect by policy D4 and elsewhere (including other parts of this policy A26 regarding links to the town).

Description

This section appears as supporting text to Policy A26 (it is not in the blue box). It adds ancient woodland, Policy E4 and potential air quality issues to the list of ‘key considerations’, and the University agrees that these are considerations to be addressed in bringing forward the new development required by Policy A26.

The illustrative masterplan framework takes account of ancient woodland, providing a 15metre buffer alongside it. The through road link to the existing Surrey Research Park, to enable access Egerton Road via Gill Avenue, will be designed to minimise potential impacts on the ancient woodland. The ancient woodland will be used to provide Suitable
Accessible Natural Greenspace, and the provision and management of this is compatible with, and will take account of, the ancient woodland characteristics of the woodland.

Policy E4 is provided for by making provision for the Surrey Research Park extension.

A full assessment of air quality issues will be made at the planning application stage.

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

See above text.

Attached documents:  
Blackwell Park Local Plan Transport Statement for Reps 10 7 17[1].pdf (754 KB)  
Blackwell vision and development concept july 2017.pdf (7.8 MB)

Comment ID:  pslp172/102  Respondent:  8970561 / S.A. Hawkins  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We 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:

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- adds to air pollution in neighbouring areas, which already exceed 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:  PSLPS16/3328  Respondent:  8971233 / Tim J. Harrold  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

CPRE OBJECTION TO POLICY A26 BLACKWELL FARM, HOGS BACK, GUILDFORD  
We fully endorse and support the comprehensive objection to this site by Green Balance which has been made jointly on behalf of CPRE Surrey and the Save Hogs Back campaign.

1. Description
CPRE objects to this site being described as within the "Guildford Urban Area". It is in fact within Green Belt countryside in Shalford and Worplesdon wards and forms part of the Hogs Back to the South which is within the Surrey Hills AONB and AGLV. It is a mixture of farmland and ancient woodland and is criss-crossed with footpaths. Across its agricultural fields, there is a long distance view of the Guildford Cathedral tower from the single track driveway to Downs Place with its attractive avenue of trees. This development has been objected to by a wide range of Parish Councils including Arlington, Compton, Puttenham, Wanborough, and Worplesdon.

1. Ownership

CPRE does not agree with the categorization of this land as "Private" when it is in fact owned by the University of Surrey, a semi public body. In our opinion it would be better for this to be stated. Ownership needs to be clarified, especially as the Vice Chancellor's official house is located there, with an adjacent illuminated car park, a number of semi derelict farm buildings and a few cottages.

1. Research Park

The Research Park is owned by the University. It still has room to expand on its existing area which was originally allocated as open green fields. However, this land has not been used efficiently. It has a very low density building layout and a large amount of surface parking for cars which take up a great deal of space. CPRE maintains that the provision of a multi storey or underground car park would free up more space or alternatively new offices or other buildings could be built similar in design to the WWF HQ in Woking with parking at ground floor level and office accommodation above. CPRE does not accept that Green Belt land from Blackwell Farm should be taken for further development of the Research Park since the University already has spare space to accommodate expansion there.

1. Housing

The amount of housing for this site is 1,800 homes and 6 Traveller pitches, together with a primary school. Added to this is provision for convenience retail land a new Local Centre for community services and uses. We assume that delivery vehicles will be required for these facilities. We estimate that the new development would add 3,000 extra cars to the existing traffic congestion in the vicinity. The proximity of the hospital site would further complicate matters in terms of access and sustainability. It is our opinion that heavy existing congestion at the Egerton Road A3 roundabout would be substantially increased by this development.

CPRE understands that the University has made an undertaking to provide extra housing accommodation at Hazel Farm which has still to be met. Because of its proximity to the Thames Basin Heaths SPA, it is suggested that this requirement could be achieved by the building of a retirement care home. For some unexplained reason this has been omitted from the draft Local Plan.

1. Infrastructure

Access to this site from the Egerton Road A3 Roundabout via Gill Avenue will become even more congested were the proposed new development of 1,800 houses to be built.

Sustainability therefore is said to depend as a result on the provision of a new road to and from the A31 and maybe the building of a new railway station at Guildford West in Park Barn.

A technical report by RGP has been prepared concerning this proposed new road link to and from the A31 which questions the viability of this proposal. It appears that a range of technical and financial challenges would have to be overcome. These include whether the width of the existing roads is adequate to handle the anticipated traffic load and the existing bridge able to take the weight of the vehicles using it. The provision of an extra new road with a possible extra bridge would of course be very unsightly. There are also safety considerations that need to be taken into account in view of the history of personal injury accidents near the proposed new 4-way traffic light junction where the Down Place access road joins the A31.

CPRE questions whether the proposals for this junction is a realistic proposition. RGP indicates that the preferred highways solution would be best served by a roundabout. It is very likely that whether traffic lights or a roundabout was
bui t, there would be a requirement for street lighting which would be harmful to the AONB and be visible from a long
distance to the North. In our opinion this is sufficient ground in itself to make this proposal unsound.

We do not consider that either of these possible alternatives will provide a practical solution to the traffic congestion that
already exists at this point of the A31's approach to Guildford. The prospect of vehicles (including ambulances for the
hospital) using this road to avoid congestion at the A3 Egerton roundabout is daunting, particularly at peak periods of the
day. Should the proposed access road to the A31 be built, we would anticipate that it will be used by a very large quantity
of traffic which will stretch back from the A31/A3 junction and the traffic lights at the A31/Downs Place cross roads. The
whole proposal would have to be assessed for viability by Highways England. We believe that it is premature to submit
such an uncertain plan until a better assessment is available of cost and viability.

1. Countryside Harm and Urban Sprawl

From this policy presentation, it is hard to believe that the countryside at stake has been seriously considered. We are
talking about an urban sprawl encroachment of 1,800 houses on the edge of the town which will make the existing
congestion there worse rather than better. The new development will therefore depend on its sustainability on a yet
unbuilt road adding congestion to the already difficult A31 traffic situation and undermining beautiful Hogs Back
countryside which is recognised by everyone who knows it as a unique landscape location. Its magnificent views should be
protected and enhanced rather than undermined in the way proposed. We are also talking about Green Belt land, which
would be classified as highly sensitive by impartial observers, that borders the nationally important Surrey Hills AONB
and AGLV with its views of the adjoining countryside stretching away to the North. It would surely be unforgivable if
this were not conserved for the future rather than irretrievably harmed to meet local priorities for growth which are
unsustainable.

The Pegasus Report on Green Belt and the Countryside has taken the totally arbitrary position that this site should be
considered only of "medium sensitivity" as it fulfils just 2 of the 4 purposes of the Green Belt, which are in this case
checking urban sprawl and protecting the countryside from encroachment. It does not take account of the site's historic
setting. This far too simple approach totally fails to recognise how well this attractive Green Belt site fulfils these two
very important purposes. We concur that the site cannot serve the function of preventing coalescence as there are large
distances to the next settlement but this surely cannot lessen the importance of the roles it does perform. It is an unique
location adjacent to both AONB and AGLV land which are also within the Green Belt. It is in fact one of the most
important sites in the Guildford area. We therefore object to the categorization of this Green Belt countryside as of only
"medium sensitivity", and request that the Inspector walk through this landscape so that he can see for himself and make
his own judgement as to the

importance of this location. Even though, after widespread public objection, the site has been reduced in scale to 1,800
houses, to lessen to some extent its impact on the Hog's Back, the access road required to the A31 will have a serious
adverse effect on this beautiful natural landscape and protected countryside. This harm will be made even worse at the
A31 junction if street lighting has to be installed. We do not agree that just because the Green Belt site has only passed 2
elements of the Pegasus test it can be said to have "failed" and therefore be considered for development. We further do
not agree that the "benefits" for the allocation of this site add up to the "exceptional circumstances" required for a Green
Belt boundary review which would justify the harm it will cause to this very unique countryside.

1. Landscape Evaluation

In 2007 GBC and Land Use Consultants published its Guildford Landscape Character Assessment & Guidance which
includes in section B1a study of the Hog's Back Chalk Ridge. This refers to its panoramic and far ranging views, its
pastoral area, and its large-scale geometric fields that dominate the north facing slopes. It refers to the sparse settlement in
a unified restrained and rural landscape except for the visual and physical segregation created by the A31 trunk road
along the ridgeline with the visibility of moving vehicles and associated noise. This document was made available to
Natural England who are committed to carrying out a boundary review of the Surrey Hills AONB and AGLV in this area
with a view to rural protection being extended more widely to cover this high quality countryside which is seen to be of
potential national importance. Preliminary work in this context has already been undertaken by Hankinson-Duckett for
Natural England. The Parish Councils of Compton, Wanborough and Worplestone have now commissioned a new study
report for the draft GBC.
Local Plan which has been carried out by Landscape Management Services. This indicates that nearly the whole of the 265 hectare Blackwell Farm was of a landscape scenery quality that could merit inclusion within a revised Natural England boundary for the Surrey Hills AONB. Accordingly, we believe that it would be illogical to proceed further with the proposal for Blackwell Farm in the light of so much professional opinion, especially as the new access road to the A31 would be very damaging to a widely extended area of rural countryside and agricultural land, both by day and by night, from extra noise disturbance and light pollution. We believe that this proposal has to be deleted as unsound from the draft Local Plan because of its impact on the AONB and the setting of this very special landscape.

CPRE OBJECTION.

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

Attached documents:

<table>
<thead>
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Attached documents: [LP2016 Transport Technical Note Tim Harrold.pdf](#) (4.6 MB)

<table>
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<tr>
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Attached documents: [LP2016 Housing Hog's Back Natural Beauty Evaluation Tim Harrold.pdf](#) (8.9 MB)

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

Attached documents: [LP2016 Housing Green Belt Research Tim Harrold.pdf](330 KB)

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Comment ID: pslp172/270  Respondent: 8971233 / Tim J. Harrold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/2120  Respondent: 8972321 / D Coghill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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• Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
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Comment ID: pslp172/329  Respondent: 8972417 / Andrew Halliday  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Attached documents:

Comment ID: pslp172/285  Respondent: 8973025 / Jean Parr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: PSLPS16/6677  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: pslp172/812  Respondent: 8975329 / James Dearnley  Agent:

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Attached documents:

Comment ID: pslp172/1141  Respondent: 8978273 / Robert Mackie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<th>Comment ID: PSLPS16/1921</th>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: pslp172/4952  Respondent: 8984097 / Richard Beeston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: PSLPS16/3969  Respondent: 8984385 / Malcolm Prior  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Comment ID: pslp172/498  Respondent: 8984385 / Malcolm Prior  Agent:
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Comment ID: pslp172/4841  Respondent: 8985633 / Jean Miller  Agent:

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Comment ID: PSLPS16/4047  Respondent: 8986433 / A Millard  Agent:

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### Comment ID: pslp172/404  Respondent: 8987553 / L Wainhouse  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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- disregards an independent expert landscape study, which demonstrates that part of the sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

### Comment ID: PSLPS16/4285  Respondent: 8990721 / Andrew herzig  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Having lived in Guildford almost all my life, I am very concerned that the infrastructure of the roads into Guildford, especially from the Hogs Back, would not cope with the extra traffic generated by this proposed very large development. Currently, the A3 through Guildford is busy and, with existing junctions and traffic volume, can quickly become a huge bottleneck during the rush hour, especially if there is a breakdown or accident anywhere in the vicinity. The large housing development proposed, with resultant extra cars, delivery vehicles etc. would inevitably substantially increase the traffic volume, thereby further slowing the traffic flow for everyone using these already congested roads for commuting to and from work especially.
The planned access to the new development from the A31 is supposedly partly to relieve pressure on the existing A3 junction at Tesco’s, but with the scale of the planned housing development and extension of the business park, I can only foresee that the proposed junction with the A31 will create another unpleasant traffic bottleneck in addition to the existing one.

I therefore believe that development of this particular site can only be detrimental to the already overstretched road network of our borough and I am strongly opposed to it.

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

Attached documents:

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I am writing to express my opposition to this proposed development on environmental and aesthetic grounds. As nature lovers and walkers, my wife and I regularly walk from the back of our house in Applegarth Avenue and within 5/10 minutes, we are walking around the fields which have been earmarked for this proposed development, admiring the extensive views up towards the Hogs Back. Apart from the fantastic sense of open space, far-reaching views in all directions, and peace and quiet, the area is home to a large variety of birds (some on the endangered list – yellowhammers, little owls, curlews and skylarks) and other wildlife.

It seems madness to me to destroy this rare downland wildlife habitat and beautiful environment in the Green Belt (and Hogs Back AONB) which is free for all to enjoy, so please seriously consider this in your appraisal of options for housing development in our borough.

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

Attached documents:

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I am writing to object to the proposal to build a new railway station as part of the larger development plan for the Blackwell Farm site. If a station were built, it seems likely that the footpath running along the back of our properties in Applegarth Avenue would become a very busy station access walkway leading under the existing railway bridge. One of the things which attracted us to move to Applegarth Avenue 15 years ago was the easy, unrestricted on-road parking. Is there any possibility of keeping things that way if we have a new railway station in the immediate vicinity? Nobody in Applegarth Avenue or the surrounding streets wants to see their neighbourhood turned into an extended station carpark.

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

Attached documents:
**Comment ID:** PSLPS16/5333  **Respondent:** 8991073 / Mark Psyne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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 to develop site A26 Blackwell Farm. This area is greenbelt, boarders and frames the setting for the AONB. Development in this area will cause significant additional congestion on the A31 and A3. This site is unnecessary when others in particular brown field areas are available.

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

Attached documents:

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**Comment ID:** PSLPS16/4108  **Respondent:** 8991233 / c Dorman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

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**Comment ID:** pslp172/4817  **Respondent:** 8991233 / c Dorman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
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- add to Guildford's pollution.

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

Attached documents:

Comment ID: pslp172/1790  Respondent: 8994209 / Michael Tanner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We 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:

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- adds to air pollution in neighbouring areas, which already exceed 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: pslp172/1791  Respondent: 8994273 / Ludmilla Tanner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We 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]
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• adds to air pollution in neighbouring areas, which already exceed 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: PSLPS16/2086  Respondent: 8996641 / Wamadeua Balachandran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

• Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

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

Attached documents:

Comment ID: pslp172/718  Respondent: 8996641 / Wamadeua Balachandran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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• adds to air pollution in neighbouring areas, which already exceed 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: PSLPS16/622  Respondent: 8996801 / Andy Clutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: pslp172/1443  Respondent: 8998465 / Tracy Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
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- adds to air pollution in neighbouring areas, which already exceed 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: PSLPS16/5960  Respondent: 8999361 / William May  Agent:
I, the undersigned am in complete objection to the land at Blackwell Farm being built upon as part of the Guildford Plan.

I have a young family, and we regularly go to walk and play in the land and woods adjacent to the Research Park and through Blackwell Farm: we walk up to the Hogs Back and enjoy the view: we forage throughout the year to provide food for our family: we enjoy the skylarks singing and the views where all but the cathedral tower is blocked by the mature woodland.

We are dismayed that this proposal is still on the Guildford plan and ask for it to be rejected on the following grounds.

**True boundaries of Area Outstanding Natural Beauty**

To build on Blackwell Farm and the Hogs Back would blight the views of the wonderful Surrey landscape for miles and miles. The beautiful ridge can be seen from the ranges on the next ridge and beyond, and to have buildings on it would be to the detriment of our county. I ask that the recent study by Land Management Services be honoured which showed that Blackwell Farm and the Hogs Back meet all of the criteria for being an area of outstanding beauty (AONB) and should therefore be recategorised accordingly.

This also includes the land up to the current Research Park boundary, as if these are built upon, this will be seen from the Hogs Back and ruin the views from the top. And therefore undermine the designation as an AONB.

Surrey University's proposal to build properties to high environmental standards that would be sympathetic to the locality is completely unachievable, as any building on that land would be to the detriment of the AONB.

There is already a recycling centre on the southern side of the Hogs Back which is an eye-sore and can be seen from the ridge, surely Surrey County Council is not going to do the same on the northern face of the ridge.

All of the land earmarked is either an Area of Outstanding Natural Beauty, Area of Great Landscape Value or Greenbelt and should be protected by law.

**Building on Greenbelt**

Originally defined to stop Urban sprawl, I feel that it is illegal and immoral to keep changing the boundaries of the Greenbelt, and this area should remain Greenbelt so that there is a clear rural area between developments.

**Risk of flooding to local area**

The Hogs Back, one of the highest points in the area, naturally drains onto Blackwell Farm, this then drains in to Park Barn. Currently the farm land becomes waterlogged each winter, and slowly releases the water into the ditches and
culverts to the back of the properties on Applegarth Avenue. These are currently just able to cope with the rain, however, as soon as the land is covered with tarmac and houses, it is a huge concern that the properties will be regularly flooded. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

This is a huge concern to us as if our house were ever flooded it would affect our insurance premiums and make our house price fall considerably. We know from the experience of a family member that flooding protection often fails, and we do not trust the developers to make sufficient provision in this matter.

**Surrey University's poor use of the land that they have already developed**

A brief walk through the Research Park, or University Campus will soon show you that the University does not build things to high environmental standards. They have a sprawling campus, covered with ground level car parks: street lighting that is left on permanently adding light pollution to the local area: they have felled dozens of mature oaks in the building of the car parks and buildings: they have air conditioning units for large office buildings that are left on all night adding noise pollution to the local area.

To allow a further 10 – 11ha extension to the Research Park when they have made such poor use of the land they have already built upon would be a poor decision by planners.

Their history so far does not show any evidence that they will make any environmental considerations, it will purely be financial.

**Proposed railway station**

This will be to the detriment of the local residents in Park Barn despite what the Local plan says. Firstly due to the added noise and light pollution for the residents that back on to the railway line. Secondly, people will start to use the local estate as a car park for the railway stations. Obviously the council will then place parking restrictions on the roads, but then there will not be enough parking for the local residents and their visitors. We already have students for the University and hospital staff parking on the estate, it cannot take much more of this.

It is also proposed that it will serve existing housing developments. This is unnecessary as there are two extremely good bus routes for the local people in to Guildford town centre and the railway station. This will be purely for the Research Park, and if they were prepared to use public transport already, there is sufficient.

**Traffic**

To build the road that will provide access to the proposed development on an already busy junction of the A3 and A31 is ludicrous. There have already been fatalities on this stretch of the road which is getting busier each year, but to add another 3 – 4000 cars to that area of road can only cause more problems. We know that SCC are making plans for that stretch of road, but they are not listening to local people and councillors who have been asking for speed cameras on that stretch, so we do not trust their judgement.
The junction for the new road will also be on the ridge of the Hogs Back, therefore visible for miles around and a blight throughout the AONB, even with the landscaping proposed by the developers there will be noise and light pollution. As cars accelerate and decelerate, the noise pollution is worse, so this will be to the detriment of the local area.

To provide access from Gill Avenue will only add to the traffic on the west of Guildford around Park Barn, the Hospital and Research Park. This area cannot cope with any more traffic, especially as any light sequences are always swayed in favour of the Research Park, and not the local people.

Services

There are already not enough school places on the proposed development side of Guildford, short-sighted planning by previous councils has led to this. Our hospital and GP practices are also unable to cope with Guildford's requirements. Although provision has been made for a two form primary school, there is nothing for a secondary school, so all children once that age would have to go along the A31 and A3 to get to school, or go through the heavily congested Research Park. This is ill-advised and not at all safe.

Pollution

I have already mentioned the noise and light pollution that comes from the Research Park, added to the additional light and noise pollution from the proposed development, this again would be to the detriment of the current AONB.

Wildlife Habitat

The land proposed to be built upon has a huge selection of natural flora and fauna: nesting skylarks, deer, kites, ancient woodland, nightjar, orchids, to name a few.

Ancient Roman Road and Settlement

The land to the rear of the Research Park has huge historic value, and is a scheduled ancient monument, this area should not be developed upon.

Unable to afford rural house prices

We chose our house because although it is in a town, it is right next to an area of natural beauty, and fields that you can walk through in all seasons. We are unable to afford a house in a village and this was the next best thing for us as a family. No doubt, so as to make the most money from this development, the plan would be to put the less profitable houses nearer the railway line, and those which the premium could be charged for will be in the higher locations.

Green spaces

We do not believe that the University will provide enough green spaces - certainly how could they provide such long vistas as are already in the AONB and AGLV. Anything that they do provide will be a mere shadow of what once was, and this cannot be allowed to be. We know that there is already a meadow near to the Sports Park, but this is not
advertised. We stumbled upon it once by chance and although nice in part, is artificial and tiny compared to the site planned for development.

True green spaces, and not manufactured ones are vitally important for the emotional and physical health of people. Anything that was created would no doubt mean a car journey for us to get to, and nothing in comparison to the beauty that Blackwell Farm and the Hogs Back currently proffer.

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

**Attached documents:**

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**Comment ID:** pslp172/926  **Respondent:** 8999585 / Wai Chung Leung  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We are all "Objection" to the Policy A26 (Blackwell Farm) under the Guildford Borough Council's Proposed Submission Local Plan (2017).

Under the inclusion of Blackwell Farm as a development site (Policy A26 & paragraph 4.1.9).  
1.) It destroy the Outstanding Natural Beauty and the Natural Landscape of historic parkland.  
2.) Impact on the local traffic network and increasing congestion in the area of A31 and surrounding road traffic network and hospital and all around local area.  
3.) Impact on the local traffic network and increasing congestion in the area of A31 and surrounding road traffic network and hospital and all around local area.  
4.) Impact on public health and safety as air pollution in the neighbouring area which has already shown exceeds safe EU limits for Nitrous Oxide.

With all the negative impact on the daily life and health of each individual in the neighbouring area. WE ARE ALL OBECTION TO THE POLICY A26 (BLACKWELL FARM) UNDER THE PROPOSAL.

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

**Attached documents:**

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**Comment ID:** pslp172/641  **Respondent:** 9003009 / Nicola Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
We 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 sites 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
- 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 for Nitrous Oxide.

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: PSLPS16/2338  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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 Blackwell Farm development on purely practical grounds. It is hard to see how another 3 or 4 thousand cars could possibly be fed into the already highly congested area where the A31 and A3 meet. Even with the proposed traffic light at the top of the proposed new road up through the A.O.N.B om Down place, How many cars are you going to be able to feed in to the stationary queue of traffic on the A31 at peak times, with each change of the lights? Four or five? How long will it take to feed in a thousand or more? Meanwhile, they will be queuing up on the steep slope, which is going to seriously exacerbate the air pollution, which I believe is already as bad in parts of Guildford, as in central London. Then there is the question of how ambulances are going to get through all this extra congestion, to reach the hospital. The other proposed access road through Gill Ave, is already seriously congested at peak times, without adding another 1,000 odd cars to the situation, even if government funding is forthcoming to widen the A3. The argument that most of the people in the new estate will work locally is pure wishful thinking, as houses will be sold to the highest bidder i.e. the London market.

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

Attached documents:

Comment ID: pslp172/3131  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I particularly want to strongly object to the inclusion of Blackwell Farm as a development site[Policy A26 & para.4.1.9.], as this disregards an independent expert landscape study, which shows that part of the site merits A.O.N.B. status, following Natural England's forthcoming boundary review[para4.3.8.] Even without that, the new road running right across the existing AONB will reduce it to a narrow strip of land, with a dual carriageway on one side, and 1800 houses on the other. Will it still meet the criteria to be called an AONB? I doubt it.

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: PSLPS16/3701  Respondent: 9009185 / Diana Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object strongly to building on the Blackwell Farm site, where numerous NPPF instructions would be contravened, and also National and International commitments on protecting Biodiversity. It would make a mockery of these 'instructions'. Surrey University should be forced to honour their commitment to building on the Green Belt land they were given, in good faith, in 2004. As the Green Belt was pushed back for the University in 2004, they are not entitled to apply to push it back further until at least 2024.

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

Attached documents:

Comment ID: pslp172/43  Respondent: 9010049 / DW Garrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/1181  Respondent: 9011777 / B Parratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
<table>
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- disregards an independent expert landscape study, which demonstrates that part of the sites 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
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:
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- destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
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- result in rat-running through local roads
- add to Guildford's pollution

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

Attached documents:
I wish to lodge my objection to any further development of Blackwell Farm and surrounding area (Manor Farm etc).

Living in Onslow Village we already get trapped when the A3 and A31 (Farnham Rd) get gridlocked due to minor incidents from the M25 down to Hindhead.

The road infrastructure is not in place to be able to cope with the extra traffic, people etc that this development will bring.

The A3 through Guildford already struggles to cope with the amount of traffic now and as soon as a car breaks down the whole town and Onslow Village become completely blocked. People use Onslow Village as a cut through and race through the streets already this will only get worse as they try to dodge the queues.

This development will also cause a beautiful green area to be totally ruined, this will affect the wildlife, the flowers and fauna as well as cause increased pollution and traffic noise.

The schools cannot cope Guildford County School is already having to build an extension in order to add 20 more pupils.

The university is gradually getting bigger and bigger with more and more student accommodation appearing.

This would just be one development too much.

Stop this nonsense now - refuse this planning proposal.

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

Attached documents:
We 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:

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Attached documents:

Comment ID: pslp172/1600  Respondent: 9022945 / Julia Dovgiallo  Agent:

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

Attached documents:

Comment ID: pslp172/557  Respondent: 9023841 / Ian Webb  Agent:

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- add to Guildford's pollution.
- put additional strain on local doctors/schools/dentists etc

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

Attached documents:

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**Comment ID:** PSLPS16/623  **Respondent:** 9029633 / Jean Pereira  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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**Comment ID:** PSLPS16/838  **Respondent:** 9030849 / Steven Archibald  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

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Comment ID: pslp172/1615  Respondent: 9036961 / Andrew Lowther  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1993  Respondent: 9037185 / E Moseling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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I object to proposals in the draft plan particularly those intended at Blackwell Farm. What are The University, I thought they were a place of higher education not a vast profit making machine whilst they need funding to progress but not at the expense of our countryside.

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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: pslp172/468  Respondent: 9040801 / John Alderman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: PSLPS16/827  Respondent: 9042273 / Janet Garbutt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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I object to the Blackwell farm development on Greenbelt; The university should build high rise on campus to accommodate students.

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

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

Attached documents:
I object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. As for Gosden Hill, the deferral is not a genuine reduction but merely a presentational exercise.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

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

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We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:
I strongly object to the GBC draft local plan proposal to build 1,800 houses, industrial park and highway on the slopes of the Hogs Back at Blackwell Farm. I object to this development on the following grounds:

1. Destroy views from the Hogs Back ridge which has Area of Outstanding Natural Beauty status
2. Remove 72 hectares of scenic farmland and ancient woodland from the green belt
3. The development will have a significant impact on traffic on the A31 a route which already has major congestion.

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

Attached documents:

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Comment ID: PSLPS16/3793  
Respondent: 9298689 / Rod Wild  
Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site A26 Blackwell Farm

OBJECT. This is an appalling desecration of the AON B and its surroundings. It is good Green Belt (see QJ). The University should get on with the planning permissions it already has.

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

Attached documents:

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Comment ID: PSLPS16/4042  
Respondent: 9321281 / leone palmer  
Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

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Comment ID: pslp172/5038  
Respondent: 9331937 / Margaret Hall  
Agent:  

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Page 230 of 941
We 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:

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- 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 for Nitrous Oxide.

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

Attached documents:

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This response focuses on the proposed allocation of Blackwell Farm as a major development area in Policy A26, together with associate Save Hogs Back and Campaign to Protect Rural England (Surrey) object to the Proposed Submission Local Plan on the following grounds:

Legal compliance:

1. Failure to have regard to national policies and advice contained in guidance issued by the Secretary of State, in respect of policy on Green Belt and Areas of Outstanding Natural Beauty (Planning and Compulsory Purchase Act 2004,s19(2)(a));and
2. Failure to have regard to the resources likely to be available for implementing the proposals in the document, in respect of the infrastructure requirements needed to allow the Blackwell Farm development (Policy A26) to proceed (Planning and Compulsory Purchase Act 2004,s19(2)(i)).

Soundness:

1. The proposals to remove land from the Green Belt at Blackwell Farm and to promote development there within and in the setting of the Surrey Hills Area of Outstanding Natural Beauty are not consistent with Government policy;
2. The proposal to develop land at Blackwell Farm is not justified as this is not the most appropriate strategy when considered against its reasonable alternatives;
3. The proposal to develop land at Blackwell Farm would not be effective as it is not deliverable over the Plan period due to the impracticability of access and high infrastructure

This submission sets out the grounds on which Save Hogs Back and Campaign to Protect Rural England (Surrey) support these challenges to the Plan. We ask that:

1. Policy A26 Blackwell Farm,Hogs Back, Guildford be deleted;
2. The Blackwell Farm site remains in the Green Belt;
3. The housing provision in the Plan be reduced by 1,800 dwellings;
4. The infrastructure provision associated with Blackwell Farm be dropped

Access to Blackwell Farm and traffic

2.1 Policy A26 allocating Blackwell Farm for urban development is entirely clear (under 'Requirements: Infrastructure' that "The principal vehicular access to the site will be via the existing or a realigned junction of the A31 and the Down Place access road, which will be signalised". This is impractical. It is also so costly as to be undeliverable. The highways works are also highly undesirable on environmental grounds, which are addressed in section 3 below.

Impracticality of access from the Hogs Back

2.2 Compton Parish Council commissioned RGP - Transport Planning and Infrastructure Design Consultants to advise on the transport and highway implications of the proposed Blackwell Farm development. This report is in draft and available from Karen Stevens. It demonstrates that there is insufficient space on the A31 to construct the minimum necessary road space and associated infrastructure to allow the proposed signalised junction to be built. At least 20m total highway width is required, but the existing highway is just 14m at this point due to the road being contained within the A31 overbridge structure. This could only be remedied by hugely expensive highways improvements on the top of the Hogs Back, including widening the A31 bridge over the A3 and acquiring and demolishing dwellings on the north side of the A31. These have been omitted from the estimate of costs for enabling the Blackwell Farm development to proceed.

2.3 The report also shows that the anticipated traffic volumes on the roads meeting at the top of the Hogs Back are easily sufficient to warrant the construction of a roundabout at this Guildford Borough Council has not proposed a roundabout, presumably because there is wholly insufficient space for this to be built, and there is a likelihood of significant danger to highways users from attempting to insert a roundabout in immediate proximity to the split-level A31/A3 junction. Whether a signalised junction could work remains unproven.

2.4 The road layout at the eastern end of the Hogs Back is the proposed access off the A31 into Blackwell Farm would be at the existing Down Place junction. This is a very small junction which would need major improvement including left and right egress lanes onto the A31 which extend well back to absorb the substantial volume of vehicles expected to queue at the signalised junction. The road layout would need amendment to overcome the sharp dog-leg bend in Down Place close to the A31 junction. It is not certain that the existing bridge over the A31 exit slip-road (onto the A3 northbound) is wide enough given the need for bus, pedestrian and cycle access. There are also existing traffic restrictions in place to limit bridge loading.

2.5 Even if all these upgrades to the highways were achieved, the road layout would frustrate many drivers. First, modelling suggests (Surrey CC SNTRAM model - see RGP Figure 3.1) that two thirds of Blackwell Farm residents exiting Down Place onto the A31 in the morning peak would expect to turn left towards Guildford. The road is already heavily congested at this point at this time, so exit would be limited to a few vehicles that could find some exit space at each phase of the proposed traffic lights. There would be substantial queues back towards Blackwell Farm. Second, the road layout also seriously impedes access to or from the A3 north-east of the site around Guildford city centre. Drivers southbound on the A3 aiming at Blackwell Farm would take the A31 diverge to join the A31 westbound, but this would find themselves west of the Down Place junction to Blackwell Farm. Drivers would therefore be obliged either to effect a U-turn through a point in the central reservation of the A31 or continue to the Puttenham junction with the B3000 where they could turn around. Either would be frustrating and time-consuming. Both would be dangerous, as accident statistics presented by RGP demonstrate. Correspondingly, any drivers leaving Blackwell Farm from Down Place and aiming for the A3 northbound would similarly need to turn right and begin their journey by travelling in the wrong direction: they too would need to effect a U-turn through a point in the central reservation of the A31 or continue to the Puttenham junction with the B3000. Then they would return eastbound on the A31 join the morning peak queue, and take the slip-road to the A3 under the new Down Place bridge in order to travel north on the A3. The numbers of vehicles needing to make these awkward manoeuvres would increase the danger to themselves and to other road users. The alternative would be turn left out of Down Place into queue of traffic during peak hours before cutting through residential streets in Onslow Village and joining the A3 at the Tesco roundabout.
2.6 There is no certainty that the third party land required for the highways improvements would be available: the Borough Council has not demonstrated that it will be. There has been no indication that Highways England would agree to the widening of the A31 overbridge.

Alternative access to Blackwell Farm from Guildford

2.7 Proposed Submission Policy A26 states that "Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue."

2.8 Without this access, the Blackwell Farm site would not be an urban extension but a free-standing urban development which happened to be located close to the edge of Guildford. The likely reason Guildford BC views this as a secondary access rather than the primary one is because it will be very difficult to achieve in a way which significantly increases highway capacity. The starting point for considering the Blackwell Farm site is that access into Guildford and to the A3 would all be via the 'Tesco' roundabout on Egerton Road, which is already highly congested. The Inspector's Report into the Guildford Borough Local Plan Review, in September 2001, reported on the (then) proposed development of Manor Park on Manor Farm:

"The principal access to the site from the A3 and the Stag Hill Campus is the roundabout immediately to the west of the A3 (the Tesco roundabout). This roundabout and other elements of the local road network are likely to be operating above their normal capacity before the development of Manor Farm is commenced" (paragraph 16.9.5).

"...the Council and the highway authorities were satisfied that a sustainable solution to the movement implications of the [Manor Farm] Proposal could be found and that to this end the University would, and could, if need be in conjunction with the authorities, confine the increase in traffic generation from the Manor Farm site to no more than 5%..." (paragraph 16.9.7). "...it is implicit in the agreement that if the 5% ceiling can not be achieved, the scale of the development will also need to be limited" (paragraph 16.9.9).

With that development and much of the Manor Park scheme now implemented, the congestion locally is even worse. We are aware of no efforts to enforce a 5% limit on the increase in vehicles associated with University of Surrey development. Efforts to alleviate this congestion may help, but fundamentally the scale of congestion in the peak periods reflects problems across the local network. If capacity were to be created on the Tesco roundabout, the likelihood is that this would immediately be taken up by the generation of additional trips, currently frustrated.

2.9 Gill Avenue, which passes the Royal Surrey County Hospital and leads directly to Egerton Road, will be difficult to join to Blackwell Farm (to its west). This is because a road would need to follow an awkward route either north or south of the Ancient Woodlands of Strawberry Grove and Manor Copse which shield the whole of the western side of the Research We strongly oppose any access through the Ancient Woodland as this would be environmentally entirely unacceptable. Road access north of the Ancient Woodland would funnel Blackwell Farm traffic through the Research Park. Road access south of the Manor Copse Ancient Woodland would funnel traffic through the Manor Park student village and ruin the setting of a Scheduled Ancient Monument (a moat at Manor Farm). It would also isolate newly constructed Veterinary School buildings from their paddocks. The road would therefore introduce pollution into a series of sensitive receptors (Ancient Woodland, the Veterinary School, student accommodation and horse paddocks) and pose a clear danger to students and other existing users of the area.

2.10 The problem appears to be that Guildford BC decided some years ago to allocate Blackwell Farm for development on the assumption that access problems could be resolved, but now finds that this is not practicable. The Issues and Options consultation in October 2013 proposed the site for urban development, but noted "There are however constraints in terms of access to the site from the A3, particularly given that where access would likely be required is in the AONB or very close to it. The site as a whole is very close to the AONB, which would require sensitive development and careful consideration." Following this, the Council tried to secure access direct from Guildford, via the 'Tesco' roundabout and Egerton Road. The heavy existing congestion on this side of Guildford turned out to make this problematic and little apparent progress has been made. Internal correspondence within Guildford BC on 12 June 2015 obtained only by Freedom of Information request illustrates this:

"Tesco Roundabout (Egerton Road/A3 northbound slips)"
GBC has been developing a junction improvement scheme for Tesco roundabout which could offer a substantial capacity improvement and may significantly reduce peak hour queuing. The improvement is subject to funding and to the existing hotel access being closed to vehicular traffic with a new access from the Sports Park access road. The layout is also subject to Safety Audit and technical approval. However, we thought it would be beneficial to share this layout with you on a confidential basis so that you can be informed of the likely scale of improvement required.

The next stage is for GBC to discuss this layout in more detail with SCC in order to get some idea of the technical aspects of the proposal agreed. For your information, the layout has been presented at the Surrey CC/Guildford BC Joint Infrastructure Group meeting which is also attended by Highways England. (Email from [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], Transport Consultant (Policy) to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (Interim Head of Planning))

Little appears to have come of this initiative so far.

2.11 Meanwhile, Surrey County Council as Highways Authority is concerned about introducing additional traffic into this congested area from the A31. The extraordinary outcome of these difficulties is that the Proposed Submission Local Plan proposes the primary access for Blackwell Farm should be from the A31 at Down Place, whereas Surrey County Council has specifically advised that the primary access should be via Egerton Road.

2.12 Surrey County Council has advised a member of Save Hogs Back that a signalised junction at Down Place would not be adequate for the volume of traffic likely to want to use it, and has therefore been keen to discourage use of that access point. The methods proposed were making the route through Blackwell Farm tortuous and restricting access by means of Automatic Number Plate Recognition (ANPR). This is made clear in the exchange of correspondence between Karen Stevens (Save Hogs Back) and [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (Transport Development Planning Manager West, Surrey CC) (see email exchange 3-7 June 2016 ‘Re: Access to Blackwell’ The Surrey CC response was after consultation began on the Proposed Submission Plan, demonstrating the gulf in approach between the two arms of local government at this critical stage. Surrey CC advised that:

"were ANPR to be implemented, it could be on a private section that formed the ultimate short link between the new development and the existing UniS activities in West Guildford. This section of the route would therefore not be adopted. ANPR is used on motorways/other routes (including the A3 between Boundless Road and the A333 where it is in a tunnel) where there are average speed restrictions in place. Clearly these are not used to control access on the public highway, and I recognise that this would be a quantum leap to use this technology on the public highway for these purposes.

2.13 Surrey County Council's position now is that "All of the principles behind the access strategy would need to be justified through the production of a Transport Assessment, which... would not come about until the planning application/pre-planning process." The effect of the impasse is therefore that Guildford BC is seeking to allocate a site which Surrey CC is far from certain of being capable of delivery, with the County Council requesting that matters be left for sorting out at the planning application stage. Guildford Borough Council has been unhelpful in addressing the concerns raised by Save Hogs Back, with a failure to answer emails properly or at all (see 'RE: Down Place junction (UNC)’ 12-19 May 2016 and 'Fwd: Blackwell access’ 23 June 2016) and no engagement in the access difficulties raised by their own proposals. Our experiences illustrate the reticence of the parties to accept the lack of feasibility of access to the Blackwell Farm site. In our view it would be irresponsible for the forwarding planning process to allocate Blackwell Farm without absolutely clear understandings of how access to it would be achieved, what the network effects would be, how congestion would be avoided, and who would pay for the necessary infrastructure. It is clear that there are currently no answers to these questions.

Through access between the A31 and west Guildford via Blackwell Farm

2.14 The Proposed Submission Plan is clear in Policy A26 that "A through vehicular link is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route to the Surrey Research Park, the
University of Surrey's Manor Park campus and the Royal Surrey County Hospital. This will provide relief to the A31/A3
t Junction, in advance of the delivery of Highways England's A3 Guildford scheme." In other words, the intention is to
attract additional traffic off the A31 and A3 through the Blackwell Farm site in a 'Sustainable Movement Corridor'. We
consider there is nothing sustainable in a glorified rat-run.

2.15 Guildford Borough Council is explicitly trying to promote what Surrey County Council is trying to avoid. Given
that both ends of the route have proved impractical just to meet the impacts of the Blackwell Farm development, we
consider a further increase in their capacity is wholly unrealistic. This confusion is wholly We consider the Plan is
unsound on the ground that it is not deliverable. In addition to the practicability, we notice that Policy A26 in the Plan
expects the Blackwell Farm development to pay for this additional infrastructure for other users attracted to the
area: "Developer to provide the western route section of the Sustainable Movement Corridor on the site and make a
necessary and proportionate contribution to delivering the western route section on the Local Road Network."

2.16 There are practical problems in putting a through route into position between Gill Avenue and the A31 at Down
Place while serving the Blackwell Farm Connecting the 'Sustainable Movement Corridor' to Gill Road will be
problematic. The routes noted in paragraph 2.9 above would be tortuous if north of the Ancient Woodland, while a link
south of the Ancient Woodland would barely serve the Blackwell Farm development at all (which would all be to its
north). Both routes would send through traffic to the hospital and elsewhere through residential areas (Blackwell Farm or
Manor Park campus).

2.17 Not only are the access routes in the Proposed Submission Plan inadequate for the task, but Surrey County
Council and Guildford Borough Council have played down the traffic volumes which will need to use them at peak
periods:

- the data from SCC's Strategic Highways Assessment Report are the average for the morning peak three hours (not
  the average for the morning peak one hour, which would be 16% higher);

- no allowance has been made for the impacts of promoting a through vehicular link, but the SHAR is forced to
  acknowledge that, with this, "then flows through the development may be higher still" (paragraph 4.7.S).

The higher real traffic volumes in the peak may necessitate still larger works at the accesses, with associated
practical problems and also additional costs.

2.18 The effect of these numerous deficiencies and confusions is that there is wholly insufficient evidence to
demonstrate that the access arrangements in the Proposed Submission Plan to and through the Blackwell Farm site are
actually deliverable. This is in breach of Government policy:

- it is the intention in DfT Circular 02/2013 The strategic road network and the delivery of sustainable development
  on capacity enhancements that "Capacity enhancements and infrastructure requirements to deliver strategic growth
  should be identified at the Local Plan stage, which provides the best opportunity to consider development
  aspirations alongside the associated strategic infrastructure needs."

Paragraph 158 of the NPPF similarly requires that "Each local planning authority should ensure that the Local Plan
is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics
and prospects of the area" (emphasis added).

The proposals have therefore failed to have adequate regard to national policies and advice. The Plan is unsound because
the proposal to develop land at Blackwell Farm would not be effective, as it is not deliverable over the Plan period due to
the impracticability of access.

Cost of access to Blackwell Farm

2.19 The transport costs of the proposed works to give access to Blackwell Farm have been understated in the
Proposed Submission Plan. Some of the costs are listed in Appendix C of the Plan. The need to resolve consequential
highways infrastructure requirements is identified in Policy A26 but not costed. Further requirements have been
identified by RGP but not costed. The table below lists the main transport-related items.
<table>
<thead>
<tr>
<th>Project</th>
<th>Delivery</th>
<th>Delivered by</th>
<th>Likely cost and funding source</th>
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<tbody>
<tr>
<td>LNR3</td>
<td>New signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)</td>
<td>Between 2021 and 2027</td>
<td>Surrey County Council and/or developer</td>
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<tr>
<td>LNR4</td>
<td>Access road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)</td>
<td>Between 2021 and 2027</td>
<td>Surrey County Council and/or developer</td>
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<td>LNRS</td>
<td>Interventions to address potential highway performance issues resulting from development at Blackwell Farm site</td>
<td>Between 2021 and 2033</td>
<td>Surrey County Council and/or Highways England and/or developer</td>
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<td>SMCI</td>
<td>Sustainable Movement Corridor: West</td>
<td>Between 2018 and 2033</td>
<td>Surrey County Council, Guildford Borough Council and developer(s)</td>
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<td>NR2</td>
<td>New railstation at Guildford West (Park Barn)</td>
<td>Between 2018 and 2029</td>
<td>Network Rail, SCC, Royal Surrey County Hospital, GBC and developer(s)</td>
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<td>A26</td>
<td>Interventions to address highway network performance issues which could otherwise result from the development</td>
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<td>RGP</td>
<td>New or widened bridge over A3 on-slip</td>
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<tr>
<td>RGP</td>
<td>Widening Farnham Road A31 bridge over A3 (north side)</td>
<td>Omitted</td>
<td>Not stated</td>
</tr>
</tbody>
</table>
2.20 The need for interventions to address highway network performance issues which could otherwise result from the development is especially acute in the case of Blackwell Farm. Surrey County Council's Options Growth Scenarios Transport Assessment Report, January 2014,(to some extent overtaken by the Strategic Highway Assessment Report in June 2016) explains the likely highways effects of the various major urban developments proposed by Guildford BC (though the size of the Blackwell Farm scheme has been reduced since then from 2,250 to 1,800 dwellings). Blackwell Farm was 'Scenario 3', the sum of Scenario 2 - development of all permitted sites and three large developments just beyond the Borough's boundaries - and the south-west Guildford urban development at Blackwell Farm itself. The Options study concluded that "When comparing scenarios 3 (south-west urban extension), 4 (north-east urban extension) and 5 (Wisley airfield development) to scenario 2, scenario 3 has the largest impact on general borough wide network statistics and scenario 4 the least" (paragraph 5.1.7). The 2016 SHAR did not conclude on the relative impacts of each major urban development.

2.21 The table above shows that the stated costs purely for access to the Blackwell Farm development (and associated through movement) amount to £60m. This is over £33,000 per dwelling In addition, there would be very serious additional highways costs to resolve the consequences of Blackwell Farm in the wider network beyond the site and to achieve the junction improvements with signalised lights around the Down Place access. Those are just the transport costs attributable to the development; in addition, Policy A26 refers to other supporting infrastructure including a two-form entry primary school, local retail centre, GP surgery, open space, playing fields and allotments. Secondary education is only not mentioned because a secondary school at the nearby proposed urban development at Flexford/ Normandy is expected to serve the Blackwell Farm development. Furthermore, 40% of the dwellings built will need to be affordable (Policy H2), largely cross-subsidised from the private open market housing for sale. All the usual gas, water, electricity and sewerage services would be needed, and typical contributions to local government services. The transport-related costs alone are far more than a development of 1,800 houses and 31,000m2 of employment could realistically bear. Together with all the other infrastructure necessary to allow a new community to proceed, the scheme is undeliverable financially.

2.22 We conclude that Policy A26 on Blackwell Farm is not legally compliant because it has failed to have adequate regard to the resources likely to be available for implementing the proposals in the document, in respect of the infrastructure requirements needed for the development to proceed; no regard at all has been had to a range of substantial The policy is also unsound because the proposal to develop land at Blackwell Farm would not be effective, as it is not deliverable over the Plan period due to very high infrastructure costs.

2.23 We recommend that the Blackwell Farm urban development proposal in Policy A26 is deleted on highways grounds.

**Impact on the Surrey Hills AONB and landscape**

**Direct impact on the AONB**
3.1 The proposed development at Blackwell Farm is the only major scheme in the Proposed Submission Plan which would directly affect the Surrey Hills. The built-up urban development is proposed in the setting of the AONB to the north of the Hogs Back, but the principal access road is proposed to cross the AONB in a highly intrusive manner, and the greatly expanded access at the A31/Down Place junction would also adversely affect the AONB.

3.2 The principal impact of the development within the AONB would be the construction of a major access road up and down the steep northern slope of the Hogs. The ridge of the AONB is at nearly 500m and the northern AONB boundary in the area at Om (on the contour through Down Place Stables, below the bend in the existing Down Place access road). The national landscape designation therefore includes the whole of the steepest part of the slope through a vertical elevation of 40 metres. A road on this slope at this point would be highly damaging to the AONB, and its construction would also have further very serious impacts.

3.3 The construction of 500m of major access road on the slope down from the AONB ridge is in our view major development. As such it must pass the tests in paragraph 116 of the NPPF if it is to be acceptable. We consider it fails to do this. The proposal at Blackwell Farm is not of such overriding importance that the access to it through the AONB meets the "exceptional circumstances" required, nor can it be demonstrated to be in the public interest in view of the adverse effects. The need for the main development is predicated on an Objectively Assessed Need for housing which we consider far too high. Whether or not the Secretary of State agrees with us (either that this is major development in the AONB or that the OAN is too high), the AONB is a key consideration in its own right. The NPPF makes clear at paragraph 14 that 'sustainable development' involves reflecting policies from the NPPF where these indicate that development should be restricted, and AONB is one such policy. There is no policy presumption that housing needs should override AONB interests: the reverse applies. In view of the damage which would be done to the AONB by the proposed allocation and this being the only major allocation to do that, we consider that Blackwell Farm should be the primary candidate of all the major sites for deletion from the Plan.

3.4 The Proposed Submission Plan states as a requirement that "Primary vehicular access to the site allocation will be via the existing or realigned junction of the A31 and the Down Place access road, which will be signalised. The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV". The comment on the design of the road is as foolish as it is undeliverable. The existing access road is a beautiful country lane flanked by mature trees which is entirely typical of the AONB landscape. The first option, of 'improving' this 'sympathetically' to the standards needed by an access road for a new settlement (let alone to provide a Sustainable Movement Corridor to serve the Research Park, Hospital and other facilities), is impossible. The road is too narrow to be widened sufficiently and has a sharp bend near the bottom. This option could only be effected by the large scale removal of mature trees on one or both sides of the route, plus further damage on the lower slope to overcome the bend. Taking the substantial adjacent land beyond the paved highway itself, used in highway construction, would cause further major damage to the heavily wooded landscape of the AONB in this location. This could not be 'sympathetic' to the AONB.

3.5 The second option, of a 'new adjacent parallel access road', would introduce an appalling scar onto the steep northern slope of the Hogs. It would irreparably damage this nationally known iconic landscape, and it is absurd for the Plan to suggest that this also could be designed 'sympathetically' to the AONB (and AGLV). An inevitable consequence of forcing a wide road down a steep slope at the angle proposed would be to require a near vertical wall of chalk on the ridge-side and other earthworks. This would be part of the unavoidable degradation to the AONB associated with the road, which will be visible and intrusive from miles around. There is also a real possibility that the access road would be accompanied by street lighting under either option, introducing a damaging night-time impact into this dark AONB landscape.

3.6 The Highways Authority has indicated to us that it will require street lighting at and around the new signalised junction on the top of the Hogs Back on the A31 in the vicinity of Down Place and Down. This would be damaging to the current night-time experience: lighting currently stops east of the A31/A31 interchange, with the A31 and the AONB to the west of this largely unlit. The change would give the clear impression that Guildford had spread outwards to the west and upwards to the highest point around the city.

3.7 The proposed road down the AONB scarp would damage views to the AONB from public rights of way to the north and north east as well as from Manor Park and from more distant viewpoints in and around the The construction of the road would itself greatly increase the damage to the experience of the AONB by introducing thousands of vehicle
movements daily: this would force drivers and passengers to see and experience the visual damage done to this nationally important landscape, by the road they would be using.

3.8 In each of these respects, the proposed allocation at Blackwell Farm would run counter to the statement in the Plan's 'Spatial Vision' that "Areas of high environmental value such as Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest will be retained and afforded great New development on the edges of urban areas will be required to treat the transition from urban to rural character in a sympathetic way."

Impact on the setting of the AONB

3.9 The proposed urban development would be in the setting of the AONB to the north of the Hogs Back (and also north of but abutting the Area of Great Landscape Value). Only the access road to the A31 would be permitted on land to the south of this development. If, however, the secondary access road was aligned south of Manor Copse, then this too would pass through the AGLV.

3.10 Regard must be had to the setting of AONBs. Section 85(1) of the Countryside and Rights of Way Act 2000 states: "In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving or enhancing the natural beauty of the area of outstanding natural beauty" (emphasis added). The Government's Planning Practice Guidance draws attention to this obligation and specifically mentions proposals "which might have an impact on the setting of AONBs (Natural Environment paragraph reference ID 8-003-20140306). The setting of AONBs is not protected as rigorously as land within AONBs, but various appeal decisions before and since the NPPF - which have rejected intrusive developments in the settings of AONBs - show that it continues to be relevant to decisions. In the absence of policy guidance, the formal position is that the weight to be given to setting is a matter for the decision-taker's discretion. NPPF paragraph 115 requires that in any decision "great weight should be given to conserving landscape and scenic beauty" in AONBs. In the context of paragraph 85 of the Act noted above, this applies not only to developments proposed within an AONB but if proposed in its setting such that the AONB would be affected. This should be taken into account in plan preparation.

3.11 Both Guildford Borough Council's and Surrey County Council's Landscape Character Assessments (LCAs) identify the drama of the chalk ridge and the panoramic views, north and south, as defining characteristics of the Hogs Back. Both these LCAs also identify the significance of views to and from the ridge. The Guildford BC LCA Rural Urban Fringe Assessment of the Hogs Back references the importance of the land in providing "the setting to and views from Guildford" and the desire to maintain the "essentially undeveloped rural character" of the land. The assessment notes that: "The setting of Guildford and the AONB are both highly sensitive to any small scale incremental change".

3.12 In the circumstances at Blackwell Farm, we would expect considerable weight to be given to protection of land from inappropriate change in the setting of the Surrey Hills AONB: this is the setting of the Hogs Back, a nationally known and revered part of an AONB; the steep slope to the north from the Hogs Back ridge opens up a wonderful vista which contributes enormously to the enjoyment of the AONB, and should be protected from inappropriate change; the setting has been relatively little-damaged to date (though development by the University of Surrey is creeping out of Guildford into it), and this achievement should be continued.

3.13 The proposed development would damage the setting of the AONB, causing Guildford to sprawl yet further into the rural vista that can be enjoyed from the AONB on the Hogs. We appreciate that urban built development is no longer proposed on land south of Down Place and Manor Farm (contrast the Issues & Options and Consultation Draft stages of the Plan), though there would continue to be visual intrusion into the AONB's setting. Moreover, the continued presence of the primary access road to the site passing through the immediate setting of the AONB (and the AONB itself) remains a very seriously damaging aspect of the proposal by bringing noise and pollution into the setting, as well as visual damage from the road and the eye-catching effect of moving vehicles upon it. Furthermore, the thousands of northbound users of the primary access road daily would themselves experience comprehensive views into the setting of the AONB; their appreciation of this setting would be significantly marred by the Blackwell Farm development. We conclude that the allocation would conflict with Policy PI: Surrey Hills Area of Outstanding Natural Beauty not least because it would fail "to conserve and/or enhance the setting and views of the AONB". The impact of the urban development allocation on the setting of the AONB is not considered in Policy A26 and has therefore been neglected in the Proposed Submission Plan.
The future boundary of the AONB

3.14 Natural England has announced its intention to review the boundary of the Surrey Hills AONB. It commissioned a report in 2012 from Alison Farmer Associates, which identified areas of search for possible extensions to the This included the whole of the Blackwell Farm allocation area. A further report was commissioned by Surrey County Council on behalf of the Surrey Planning Officers Association and the Surrey Hills AONB Board in 2013 from Hankinson Duckett Associates to further evaluate the natural beauty of those areas of search (and other Landscape Character Assessment work). This proposed extensions to the existing AONB boundary on the north side of the Hogs Back (and elsewhere), but just omitted the Blackwell Farm allocation area.

3.15 The Hankinson Duckett evaluation was not carried out in detail, so in 2016 Compton and Worplesdon Parish Councils commissioned another firm of landscape architects, Land Management Services (LMS), to undertake a more detailed natural beauty evaluation in the vicinity of Blackwell Farm, Down Place and Homestead Farm to the north of the Hogs Back. The LMS report (the final report is available from Karen Stevens) agreed that the area identified by Hankinson Duckett Associates should be included within a revised AONB boundary north of the Hogs Back, but also proposed a north-eastward extension of the AONB boundary to include Down Place and Blackwell Farm. No further land at Homestead Farm was proposed for inclusion.

3.16 The LMS evaluation identified small scale character areas, one of which covered the eastern-most parts of the study area, adjacent to the built-up area of There were two parcels: one on Manor Farm (south and east of Manor Copse Ancient Woodland) and one north of Strawberry Grove Ancient Woodland. The latter comprises the north-east corner of the Policy A26 development allocation at Blackwell Farm. LMS recommended that both these parcels should not be included within the revised AONB boundary, but recommended that they remain open as the setting of Guildford and the AONB. LMS concluded here: "This area does not merit inclusion within the AONB, but provides an important buffer and transitional landscape on the western edge of Guildford. It is recommended that the boundary to [the AONB here] follows the western edge of this sub character area but includes Strawberry and Manor Copse. The semi-rural transitional character of this landscape should be retained in order to conserve the currently limited impact of Guildford on the AONB and other rural land to the west."

3.17 We consider it vitally important that decisions on the Guildford Local Plan in the near future do not prejudice the outcome of the review of a nationally important landscape designation. The most detailed natural beauty evaluation north of the Hogs Back to date (against Natural England's criteria for designating AONBs) shows that most of the Policy A26 Blackwell Farm allocation area should be included within a revised AONB boundary. The principal remaining area, in the north-east corner of the allocation, should remain open as the setting of the AONB and of Guildford.

3.18 The Blackwell Farm allocation should therefore be withdrawn so that, with a high probability, most of the land can be included within the AONB in future after the boundary review has been completed. The LMS interpretation of natural beauty confirms our own local perception that the land identified does merit AONB designation. Its high landscape quality - in the setting of the current AONB - is a major consideration for the Local Plan in any event. This would be a highly damaging location for a major urban development in landscape terms.

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

Attached documents: Appendix 4 Hogs Back Natural Beauty Evaluation V2 24.05.16 1.pdf (6.0 MB)
Appendix 3 20160704 ISSUE.PDF (2.4 MB)
Response to GBC Reg19 cons by SaveHogsBack CPRESurrey_Final Redacted.pdf (875 KB)

Comment ID: PSLPS16/3315  Respondent: 9332193 / Save the Hogs Back Campaign  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

3.19 We consider that the Blackwell Farm development allocation should be removed by deleting Policy A26 because of its impact on the AONB:

- there would be a significant direct impact of the primary access road on the AONB;
- the primary access road through the AONB would be major development in its own right, and the proposals do not fulfil the criteria for allowing such development;
- the proposed built development and part of the primary access road would have a significant adverse effect on the setting of the AONB;
- the signalled junction to the primary access road, where Down Place joins the A31 on the top of the Hogs Back, would be lit at night, which would damage the appreciation of the rural qualities of the AONB at night and emphasise the sprawl of Guildford into it;
- the primary access road from the Blackwell Farm development to the Hogs Back ridge would probably be lit at night, which would also damage the appreciation of the rural qualities of the AONB and emphasise the sprawl of Guildford into it; most of the proposed development site should be included within a revised boundary of the Surrey Hills AONB, while its north-east corner (north of Strawberry Grove Ancient Woodland) would be in the immediate setting of the AONB and should be kept free of development as a buffer between urban Guildford (the research park) and the AONB.

3.20 We conclude that the Plan is unsound because the proposal to promote development at Blackwell Farm in the Surrey Hills Area of Outstanding Natural Beauty and within its setting is not consistent with Government policy. Insufficient regard has been had to the impact of the primary access road on the AONB (and which we also regard as major development). Insufficient regard has also been had to the primary access road on the setting of the AONB none at all to the impact of the urban development area on the setting of the AONB. In that last respect we consider there has been a legal failure to comply with the Planning and Compulsory Purchase Act 2004, s19(2)(a).

Green Belt at Blackwell Farm

4.1 Paragraph 83 of the NPPF states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period." This is a continuation in principle of previous Green Belt policy (from PPG2, paragraph 9).

4.2 In the most recent review of the Guildford Local Plan, following the report of the Inspector in September 2001, there was just one change to the Green Belt. This was to allow the expansion of the University of Surrey (and two minor adjacent plots) into Manor Farm (the Manor Park development). It is a further withdrawal of the Green Belt boundary to allow more development immediately beyond the last land release that is proposed now. The Local Plan Inspector in 2001 was alert to the risk of nibbling away at the Green Belt and responded as follows to objectors who sought a more limited release of land from the Green Belt: "the guidance suggests that in reviewing Green Belt boundaries a longer time scale should be used than for other aspects of the Plan. If the normal period suggested for a local plan is ten years, it is not unreasonable to look at defining the Green Belt boundary with two local plan periods in mind. A cushion of undesignated land for future requirements, where they are reasonably foreseeable, can be accepted where it can avoid a succession of bites at the Green Belt" (paragraph 16.4.3).

4.3 The Borough Council and the University of Surrey are attempting to undermine this intention. The Local Plan was adopted in 2003, yet even when the Issues and Options report for the current Local Plan was issued in 2013, they were trying to release further land from the Green Belt in precisely the way the Inspector had been trying to save Hogs Back and CPRE Surrey are appalled at this attempt to abuse and undermine Green Belt policy and principles. The proposal reflects a remarkably casual approach to the Green Belt which should not be tolerated. Further removal of land from the Green Belt at a location where Green Belt land has only recently been released is contrary to the expectations of Government planning policy and the Plan therefore unsound.

4.4 There should be no illusion about the University of Surrey's desire to develop a huge swathe of land west of Manor Park at the foot of the Hogs Back. In November 2013 the University released its proposals for a 'Garden
Neighbourhood' stretching as far west as Flexford House and occupying the whole area between the AONB and the railway beside Wood Street Village. An illustrative page from the proposals is attached as Appendix 1. This shows comprehensive development of the area, a new junction on the A31 and a road straight down the steep northern slope of the Hogs Back. The development of Blackwell Farm would only be a stepping stone in this expansionist thinking of the University which shows a serious lack of appreciation of the role of Green Belt, the Hogs Back and the Surrey Hills AONB. Releasing Blackwell Farm is highly undesirable in its own terms and would only fuel the desire of the University to press the Council for yet more land releases in future.

4.5 The Proposed Submission Local Plan has adopted "a controlled realignment of the Green Belt boundary and development of a small number of strategic sites, which will allow us to provide for mixed and inclusive communities supported by new infrastructure" (paragraph 28). The Plan is a coy as it possibly can be about the remarkable scale of Green Belt land release for housing which it proposes. Large urban developments are proposed in the Green Belt at Blackwell Farm (1,800 houses), Gosden Hill Farm (2,000 houses), former Wisley Airfield (2,000 houses) and between Normandy and Flexford (1,100 houses). Various Green Belt sites offering over 100 houses each are also proposed.

4.6 The Government policy on Green Belt in the NPPF begins with a statement of great clarity, but one which the Proposed Submission Plan appears to have neglected or sidelined: "The Government attaches great importance to Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence" (paragraph 79). The NPPF does of course also provide considerable encouragement to the provision of the housing which the nation needs. It explains how the conflict is to be dealt with between the pressure of housing and the constraint of Green Belt (and other nationally important designations) at paragraph 14: "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless.... specific policies in this Framework indicate development should be restricted". One such policy (footnote 9) is Green Belt.

4.7 For the avoidance of doubt, the Government has issued various statements confirming its commitment to Green Belt and reiterating how the pressure to release Green Belt land should be addressed in local Plans. For example, Brandon Lewis MP, Minister for Housing and Planning, told a Westminster Hall debate on 15 March 2016:

"...we have regularly made the point that the green belt is a legitimate constraint. It is an important part of the country's infrastructure and the Government attach the highest importance to its protection. In fact, over the past few years we have increased it. The NPPF makes it clear that green belt boundaries should be established in local plans and can be altered only in exceptional circumstances, using the local plan's process of consultation and independent examination. The Government do not specify what constitutes exceptional circumstances, as it is for each local authority to determine that and how much weight to attach to those circumstances" (Hansard column 307WH).

On 11 January 2016 Mr Lewis gave a written answer to a Parliamentary Question by Mr Laurence Robertson MP (Tewkesbury), as follows:

Green Belt Question 21089

To ask the Secretary of State for Communities and Local Government, what his policy is on the priority that should be given to maintaining Green Belt land in Local Plans in areas where there is unmet housing need.

Answer Green Belt is protected by local authorities in line with national policy set out in the National Planning Policy Framework. The Framework states that permanence is an essential characteristic of Green Belt, and that a Green Belt boundary may be altered only in exceptional circumstances, using the Local Plan. Our supporting Guidance reminds local authorities that, in planning to meet their objectively assessed local housing needs, they must have due regard to national policies (including Green Belt policy) which indicate that development should be restricted and which may restrain the ability of an authority to meet all its needs. This applies even where there is no up-to-date Plan. It is for the Planning Inspector examining a revised local Plan to determine whether it is based on sound evidence and in line with national policy.

A statement to Planning from OCLG reported on 25th April (attached as Appendix 2) said:
"There are no plans or policy to relax the strong protections that prevent inappropriate development on the green belt. Ministers have repeatedly been clear that demand for housing alone will not justify changing green belt boundaries."

4.8 In our view, the statements from the Government clarify that releasing land from the Green Belt to meet housing needs is an option but is only to be undertaken in exceptional circumstances rather than lightly. Guildford Borough Council, in contrast, has chosen to meet all its Objectively Assessed Need for housing, taking whatever land is necessary from the Green Belt to secure this. Furthermore, the Proposed Submission Plan has made no real effort at all to justify the release of land from the Green Belt in the terms set by the NPPF. Paragraph 4.3.16 of the Plan simply states:

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

Claiming 'exceptional circumstances' is easy. However, there is no review of the arguments needed to demonstrate that exceptional circumstances might apply at any location in the Borough. In our view, this means that the Plan is unsound by virtue of not being consistent with Government policy, and also unlawful because it has failed to have regard to national policies and advice on Green Belt contained in guidance issued by the Secretary of State.

4.9 The purposes of Green Belt have played remarkably little part in the selection of areas for urban development in the Proposed Submission Plan. Pegasus Group for the Borough Council divided all non-urban land in the Borough into a series of large plots for analysis. Their most up-to-date analysis is given in their Green Belt and Countryside Study, Volume II Addendum Appendix 1, April 2014. This assumes that the Green Belt purpose of encouraging urban land recycling applies equally to all plots, but the other four purposes are assessed for each plot. If none or one purpose is served by the plot it is ranked as low sensitivity, two purposes are ranked as medium sensitivity and three or four purposes is ranked as high sensitivity. 41 plots in the Green Belt are identified as having low sensitivity, 67 as having medium sensitivity and 91 as having high sensitivity. Of the four major proposed urban developments noted in paragraph 4.1 above, three have medium sensitivity and one (Flexford/Normandy) has high sensitivity. It is striking that none of the plots having low sensitivity was chosen for development. The choice of sites for development was clearly not significantly influenced by suitability of sites in Green Belt terms.

4.10 Pegasus Group explains its approach to recommending 'Potential Development Areas' (PDAs) in its Volume II Addendum at paragraph 3.7:

"Volume II of the Study has focussed upon those parcels which directly adjoin the urban edge as they are likely to offer a more appropriate relationship with the main urban area than those parcels which are separate from it. It is recognised that if the Council do identify urban edge parcels as appropriate for development and removal from the Green Belt, this may offer the potential for some adjoining land parcels which do not currently connect with the urban edge to come forward in a more appropriate manner. However, such decisions will be best informed by the Council's chosen spatial strategy, and choices upon the recommended PDAs around the urban edge set out in Volume II and this Addendum."

In practice, the Borough Council did not accept this approach: two of the four main areas proposed for major development are essentially free-standing urban areas in the countryside, at Wisley Airfield and Flexford/Normandy. If these sites were considered suitable by the Council, then it should also have revisited the 41 plots previously identified as low sensitivity in Green Belt terms before deciding which to allocate.

4.11 We are not arguing that the choice of major development sites was random, but that Green Belt policy played hardly any part in the selection. On not a single occasion is a Green Belt plot retained free of development 'because it significantly fulfils Green Belt purposes'. Nor is a Green Belt plot proposed for release 'because it has little benefit in fulfilling Green Belt purposes'. We consider that the Borough Council has fallen far short of being able to demonstrate exceptional circumstances to justify any of its choices of major development area in Green Belt terms. That is a major failure of policy implementation and, in our view, makes the selection of sites unsound as (i) contrary to national planning policy and (ii) not the most appropriate strategy when considered against its reasonable alternatives.
4.12 In reality, Pegasus Group has emphasised a range of non-Green Belt planning issues which it considers important, including a highly selective 'sustainability assessment scoring' system which is dominated by walking distances. No doubt informed by this, there are important deficiencies in the Borough Council's approach when considering the possibility of releasing Blackwell Farm for development. Policy A26 refers to 'key considerations' merely as "AONB, AGLV, Access, Surface water flood risk". There is much else at stake, and no justification for changing the existing Green Belt boundary to the newly proposed one.

1. The protection of Ancient Woodland has been given little attention by Pegasus Group or the Although there is no formal proposal to fell Ancient Woodland at Blackwell Farm, the presence of Strawberry Grove, Manor Copse and Wildfield Copse immediately adjacent to the proposed development area will compromise these irreplaceable natural assets as the residents of 1,800 houses seek nearby leisure and recreation. It appears that zero weight has been given to the real impact on Ancient Woodlands and ancient hedgerows. The proposed allocation can be expected to cause the degradation of the Ancient Woodlands to the extent that over a period of time they lose much of their biological and historic interest.

2. The Pegasus Group study refers to development within landscape designations but omits review of the impact of development on the setting of the Surrey Hills. This is a major omission which we have attempted to rectify in paragraphs 3.9-13 above. Reference is made to landscape character but not to visual impact: the latter is an important consideration in close proximity to the Hogs Back and therefore an important omission in relation to Blackwell Farm.

3. The Pegasus Group study assumed that Purpose 5 of the Green Belt "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land" (NPPF paragraph 80) applied equally everywhere. We think not. The Blackwell Farm site is capable of achieving far more by way of concentration of land uses than most other sites. This is because the whole of the Blackwell Farm site is owned by the University of Surrey, as is all the land to the east. One effect of stopping development on Blackwell Farm would be to oblige the University to pay more attention to the efficient use of its land. At present the University takes a relaxed approach to land supply:

   the University has devoted large areas to inefficient surface-level car parks (view this on Google Earth, for example);

   the Research Park is specifically advertised as a 'low density rural location' (see the video spool on www.surrey-research-park.com), and provides just 65,000m2 of office space across 28.33 hectares;

   the Guildford Local Plan Inspector's Report in 2001 agreed to remove over 60 hectares of land from the Green Belt at Manor Park for University purposes, immediately east of Blackwell Farm, which has given the University an impression that land supply is not an issue; the Inspector commented "It may be that, as many Objectors felt, the Proposal is being overgenerous in the amount of land that is being taken out of the Green Belt and that this could be cut back. I have sympathy with that view" - though he still released the land for the reasons he gave in paragraph 16.10.2.

(iv) There is no Green Belt boundary available on Blackwell Farm which would be reliably permanent. The NPPF states that when Local Plans review Green Belt boundaries local planning authorities should "define boundaries clearly, using physical features which are readily recognisable and likely to be permanent" (paragraph 85). The Council's proposed western boundary to the site - the new Green Belt boundary - would follow a hedge in a dip in the landscape. The existing Green Belt boundary is superior and there is a clear risk from the proposals that Guildford could in future sprawl further west of Blackwell Farm on the basis that the boundary proposed now is indefensible.

4.13 On all these grounds the existing Green Belt boundary has superior merit to the one now proposed further west.

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

Attached documents:

Comment ID: pslp172/3397  Respondent: 9332193 / Save the Hogs Back Campaign  Agent: Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
1. The Save Hogs Back response to the June 2016 Pre-Submission Consultation (Regulation 19) provided a comprehensive set of reasons why the Blackwell Farm strategic development allocation was so unacceptable that the Council should not proceed with it. Apart from the serious environmental damage it would do, we questioned whether it was practicable. The June 2017 Consultation indicates both the determination of the Council to press ahead with this extraordinarily inappropriate scheme and also that it is trying to deny the implausibility of the development proceeding, if at all, without appalling consequences. Modest amendments have been made to various policies in the Plan, but collectively they demonstrate that after another 12 months of searching the Council has still found no solutions to the problems we identified.

2. The unresolved problems centre on access and egress. Although pitched as an urban extension to Guildford (in the Spatial Vision, in Policy A26 and in paragraphs 4.1.8 and 4.6.24), Blackwell Farm has proved impractical to integrate into the town despite its physical proximity. There are many facets to this, the main ones being:

- the Blackwell Farm development cannot proceed without the capacity of the A3 trunk road being increased to bolster the strategic route in and out of Guildford, and the possibility of this happening is unknown;
- movement between the development area and Guildford, which is already extremely congested, would be substantially more impeded by the development;
- alternative means of access to the development area would have both significant practical problems and significant adverse consequences for the highway network;
- the ‘Sustainable Movement Corridor’ to tackle that congestion is most unlikely to be effective on the scale necessary to resolve access issues and will fail in its key role of reducing congestion;
- the combined effect of the Blackwell Farm development and the A3 widening through Guildford (itself needed in part because of Blackwell Farm) would be to raise substantially the Nitrogen Dioxide levels in Compton on the B3000 still further above legal limits at the most polluted point in the Borough.

In each case the Proposed Submission Local Plan has wholly failed to show that the Blackwell Farm development is practicable. We examine these in more detail below, after showing that the pressure on the road network in the vicinity of Blackwell Farm will be discernibly greater than forecast only one year ago.

Traffic generation in relation to road capacity

3. Mouchel have pointed out, in advice submitted by Highways England in response to the Proposed Local Plan 2016, that there are significant limitations in the evidence presented in the Strategic Highways Assessment Report (SHAR) accompanying the Proposed Submission Plan in June 2016 which affect Blackwell Farm:

- the traffic generation model used in the Local Plan allows no merge delay at junctions: this is clearly not the case at present and is not claimed by GBC to be the case even after new road infrastructure has been built. As Mouchel point out, the effect of the model is to make the A3 and A31 particularly attractive roads because they are assumed to be readily accessible and to draw traffic towards them, whereas in reality there will be less ready access and greater use of the local road network;
- the model uses average peak period traffic movement figures across the three hour period 07.00-10.00, which will tend to understate movements in the true peak hour (circa 08.00-09.00). That will have a significant impact on congestion during periods when the network is most heavily used and, in the vicinity of Blackwell Farm, overloaded.

4. The SHAR indicated that the total vehicle generation anticipated by the whole Blackwell Farm development would be 717 vehicles leaving in the weekday average morning peak hour (Table 3.3, zone 576). How these vehicles would get out of Blackwell Farm has still not been properly resolved. Policy 26 includes a Plan showing an access to the development site (indeed the only access to the development site) from the A31 at its junction with the very minor road called Down Place. In June 2016 the Local Plan stated that this would be the “Primary vehicular access to the site allocation”. This
would “provide a new route to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital.”

5. The Local Plan 2016 identified that a “Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue”. The word ‘preferably’ is instructive because it indicates that it was unclear in June 2016 how Blackwell Farm would be connected into Guildford. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. On the assumption that a means of direct access would be found, the SHAR identified distribution of Blackwell Farm traffic to the network of 342 trips eastbound towards Guildford and 375 trips southbound to the A31 in the morning weekday peak hour.

6. Figure 4.3 of the SHAR estimates traffic on the principal arms of the local network with Blackwell Farm development in place including the link to the A31. This Figure shows that 1,803 vehicles would attempt to enter the Egerton Road/Gill Avenue crossroads by the Hospital in the peak morning weekday hour (one every two seconds). The 342 eastbound vehicles generated by the Blackwell Farm development would account for 19% of the post-scheme traffic on the junction (23% growth on pre-scheme traffic), neglecting the impact of any rat-running traffic. Users of the road would consider this scale of traffic growth implausible and unacceptable given the high level of congestion there at present. The SHAR confirms that the level of congestion on Egerton Road in the morning peak will be substantially worse than at present and will exceed its capacity with the development and its access roads in place (Scenario 3). Table 4.4 (Row 25) shows that Egerton Road eastbound will have a ratio of flow to capacity (RFC) of 0.92 resulting in a level of service with ‘unstable flow operating at capacity’. Table 4.12 (Row 8) shows that Egerton Road westbound will have a RFC of 1.21 (compared with about 1.04 now) resulting in the worst possible level of service with ‘forced or breakdown of flow’. In other words, it simply won’t work. The figures already smooth the morning peak hour figures over a three hour average, as Mouchel noted, so actual congestion in the peak would be worse than these indicators, even assuming zero rat-running traffic.

7. The network effects described in Figure 4.3 of the SHAR omit potential rat-running in the morning peak hour from the A31 through Blackwell Farm to Egerton Road. Drivers passing through Guildford northbound might try to miss the existing substantial queues on the A3 by leaving the A31 just before its junction with the A3 and taking the new link road which allowed them to join the A3 at the Tesco roundabout. Other drivers eastbound on the A31 aiming for Guildford could try to avoid the existing substantial queues both on the A31 and on the A3, as the new road would give them a new means of entry into Guildford from the west. The pressure for rat-running could be considerable if the link was built. Figure 4.7 in the SHAR shows that even after the A3 has been widened there will still be overcapacity and congestion on the A31 close to the A3 junction (and on the A3 through Guildford): this is likely to encourage significant numbers of drivers to dodge the queues on these roads through the Blackwell Farm development. The issue is reviewed in paragraphs 30-35 below, which show that the constraint on rat-running is most unlikely to be effective.

8. In the 12 months since the 2016 Proposed Submission Consultation by the Borough Council (working with Surrey County Council as Highways Authority and Highways England responsible for the A3), the prospect of adequate network road access to Blackwell Farm has not only made no progress but deteriorated. There are some indications of this in the alterations in the June 2017 Proposed Submission:

- the proposed link with the A31 has been downgraded from its ‘primary’ status and by default the link with Guildford is now presented as of equal significance (Policy A26 Infrastructure Requirements item 1); there are various reasons for this, explored below, but fundamentally the Council has been unable to find a way of making the link with the A31 work as it wanted;
- a major new secondary school with six form entry must now be provided on the Blackwell Farm site, which was previously sited elsewhere (Policy A26 Allocation item 9): a school of this size (circa 900 students comprising 180 students in each year group for five school years) would generate a very substantial amount of additional traffic, bringing in about 600 students daily from outside Blackwell Farm, much of it attracted from Guildford, but there have been no changes at all to the proposed capacity of the road network to accommodate this, which can only mean still worse congestion on Egerton Road and the surrounding network than inevitable anyway;
- proposals in principle are now included for limiting the road users on the new route linking to the A31 (Policy A26 Infrastructure Requirements item 3), but these are deliberately left vague as the Council has been unable to find a way of achieving this despite trying to do so for the last year;
• the developer of Blackwell Farm (ultimately University of Surrey) must contribute to funding improvements to
the local road network necessitated by the scheme, but this must now have “regard to the Sustainable
Movement Corridor Supplementary Planning Document”: as this SPD has not yet been published even in draft,
the policy change demonstrates a remarkable lack of clarity about the role of the SMC in relation to Blackwell
Farm (where it will go, how it will be built, who pays for it and how it links into the wider network) and creates
an open-ended commitment which could affect the viability and deliverability of Blackwell Farm;
• the new Policy A59 has given a clearer specification of the need for a new railway station at Park Barn near the
northern end of Blackwell Farm, with access from both the north and south sides: the access from the south will
generate additional traffic affecting the roads to Blackwell Farm, especially in peak periods, which has been
neglected in the calculation of traffic generation and the modelling of its distribution to the road network, again
placing additional stress on already massively overloaded roads in peak periods.

These changes are additional to the increased traffic on Egerton Road and the surrounding network arising in any event
from development planned or under construction at Manor Park and at the existing Research Park.

Traffic on the A3

9. Guildford Borough Council has adopted conflicting positions regarding its intentions for traffic on the A3 through
Guildford.

10. The Council has endorsed a study commissioned in 2014 from Arup Guildford Town and Approaches Movement
Study, a vision statement on transport in Guildford to 2050. This is the basis for the Sustainable Movement Corridor now
promoted through the Local Plan by the Council (see paragraphs 51-53 below). However, the Arup study was clear that
the purpose of the A3 should be to concentrate through-Guildford movements on this road, assisted by inhibiting its use
for local movements. The study recommended:

“Interventions in this strategy that reduce roadspace in the town centre should serve to deter through traffic in the
town; they should also reduce short journeys on the A3 within the town (for example, trips from the Surrey
Research Park to the town centre via the A3) that will free up capacity for longer distance trips on the A3 trunk
road”.

11. The Arup study was clear that there should be no capacity increase on the A3 trunk road through the town:

“In the appraisal of interventions undertaken for this study, all potential interventions that increased road capacity,
including A3 interventions (widening, northern bypass, tunnel) and additional road links in the town centre, resulted
in increased traffic levels in the long term over and above business-as-usual changes (i.e. in 2031 compared to the
2031 Business-As-Usual). Vehicle mileage increased by up to 2% across the borough and highway delay increased
by up to 16%, with associated deterioration in air quality, noise impacts, land use impacts and severance. These
interventions are therefore not included in the strategy as they do not strongly support the multi-faceted headline
vision for sustainable mobility in the town of Guildford identified to guide the development of the strategy.”

12. However, this study is increasingly being compromised. Arup’s limitation on using the A3 is wholly at odds with the
approach which Guildford BC is taking in practice. The Council has decided that the Blackwell Farm development
cannot proceed without substantially increased capacity on the A3. The last sentence of the 2017 Local Plan’s ‘Spatial
Vision’ states: “The delivery of housing in the later stages of the plan period is dependent upon major improvement to the
A3 through Guildford”. This is due to existing major peak hour congestion on the A3 (Local Plan paragraph 2.14a). The
June 2016 Strategic Highway Assessment Report concluded that “the results of this assessment indicate that should the
[DoT’s] Road Investment Strategy schemes [which include major A3 capacity increases through Guildford] not be
forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could
be considered severe…. To avoid this occurring in such circumstances of the RIS schemes not being forthcoming, then
the quantum and location of development as proposed may have to be amended” (page 63, emphasis added). This was
confirmed in the 2017 Addendum for the revised Proposed Submission Local Plan (Conclusion, page 2).

13. The Local Plan therefore aspires to a very substantial increase in the capacity of the A3, not least to facilitate car-
borne travel to and from the major developments planned at Blackwell Farm (and Gosden Hill Farm). The Spatial Vision
states:
“The Department for Transport’s Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange. Early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period.”

Paragraph 4.6.14 specifically explains the intention of Policy ID2 “Supporting the DfT’s “Road Investment Strategy”” as including the identified:

“Scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25):
• A3 Guildford – improving the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements.”

14. In the last twelve months, the likelihood of any of this happening has been slipping away. The Local Plan has now been altered with the deletion from paragraph 4.6.18 of the option of a tunnel under Guildford, so that a road widening scheme is now the most likely option (even if a tunnel remains the Borough Council’s preferred option – see Topic Paper: Transport paragraph 5.101). Exactly what is intended is still hugely unclear: the Infrastructure Schedule for this project in Appendix 3 shows that what is proposed is so vague that it may cost anything between £100m and £250m (project SRN5). Only a brief examination of the A3 through Guildford will in any event show just how difficult, costly and enormously environmentally damaging would be any attempt to add significant extra capacity in each direction to the A3.

15. Also deleted is paragraph 4.6.17 which had stated “Guildford Borough Council and Highways England are in the process of agreeing a Statement of Common Ground which sets out assumptions regarding both the performance and safety outcomes that the RIS schemes can be expected to realise”. This is said to be because an SoCG is likely to be agreed closer to the Examination (Topic Paper: Transport paragraph 5.14), but we would not be surprised if Highways England is unable to make the commitment the Borough Council seeks.

16. Highways England itself is doubtful about how much can be achieved on the A3 and by when. Its response to the Proposed Submission LP on 18 July 2016 stated: “There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period.” A Technical Note supporting that submission, prepared by Mouchel, was more precise:

“It should be noted that the A3 RIS 2 scheme is not a committed scheme and no funding has been allocated at present. The details of the RIS 2 A3 Guildford scheme itself are not yet known and so the modelling and testing of an A3 scheme at this stage is considered premature. As such Highways England's view is that this scheme cannot be relied upon by Local Plans to form mitigation for the development proposals.”

17. So far as we are aware, this remains the position in July 2017. The response subsequently advised that the inadequate evidence base meant that the Plan was considered unsound.

18. Guildford BC found this response hugely inconvenient and persuaded Highways England to withdraw this statement after a meeting on 1 September 2016. Highways England’s letter on 5 October 2016 doing this stated instead (with our emphasis added):

“You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. The scheme proposes widening the existing carriageway to provide additional capacity and safety improvements between the A31 Farnham Road and the A3/A320 Stoke Road. The design of such a scheme is complex and needs to consider a number of potential options, a process which takes time to complete. We will continue close working with Guildford Borough Council and Surrey County Council to progress the development of the potential scheme.

We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. Therefore we wish to formally withdraw our representation to this policy.”
19. While Highways England is urging caution, Guildford’s Local Plan continues to make highly questionable assumptions. On timing, Appendix C claims that the A3 capacity increase will be ‘delivered’ between 2023 and 2027. This conflicts with paragraph 4.6.14 of the Plan (above) which expects construction to begin three years earlier. Delivery in 2023-27 is itself barely consistent with the Council’s own Topic Paper: Transport at paragraph 5.88, which reports that “Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start[ed] until 2024 at the earliest, with construction taking 2½ years.” This would mean that the capacity would only become available in 2027 at the earliest, in effect postponing by some years the Plan’s aspiration for A3 widening.

20. On funding, there is no clarity where the money for A3 widening would come from, even if it did surprisingly pass the value-for-money test. The proposed submission Local Plan has been amended from one year ago in the Infrastructure Schedule in Appendix C to give the impression that developers are now expected to foot more of the bill, further adversely affecting the viability and deliverability of Blackwell Farm. The change states the funding source will be ‘Highways England and developer funded’ instead of ‘Highways England and developer contributions’.

21. Finally, the exorbitantly expensive, damaging and disruptive widening of the A3 cannot be expected to achieve its objective of alleviating traffic flows sufficiently to accommodate effectively traffic from Blackwell Farm. Congestion will, remarkably, be worse with the A3 widened than without it. The SHAR reports in paragraphs 4.8.4-6:

“4.8.4 Table 4.1b shows in the PM peak that while the network performs better in Scenario 5 [i.e. with the A3 widening in place] compared with Scenario 3, it is still worse than in Scenario 1 with vehicle hours higher and vehicle speeds lower by 12% and 2% respectively.

4.8.5 As noted above in Section 4.5, the capacity increases on the M25 and A3 result in some high flow increases as trips re-route to make use of the improvements. In turn, this affects roads approaching the A3, such as the A320, A31, A25 and B3000. These also see high flow increases with some, such as the A320, experiencing a significant deterioration in the Level of Service.

4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.”

22. The Borough Council’s own evidence in both the SHAR and Arup report is that widening the A3 will increase congestion in the town rather than relieve it, with associated deterioration in air quality, noise impacts, land use impacts and severance. Blackwell Farm would damage the whole of Guildford. The likelihood of the A3 capacity being increased is less now than it was one year ago. So far as we can see, the ‘do nothing’ option for the A3 remains squarely on the table and is an increasingly likely outcome.

23. In summary, the evidence on the A3 consolidated during the last year shows that it is currently simply not known:

- if a suitable widening scheme can be designed and if so how much it would cost;
- whether the scheme would meet ‘value for money’ tests;
- whether the money for it could be found;
- whether the A3 capacity could be increased in time to assist the development of Blackwell Farm during the Plan period, as the earliest provision date would be 2027 (and probably later).

Finally, even if built, the widening of the A3 would generate congestion in Guildford rather than relieve it and would itself be even more over-capacity than it is now. The Borough Council’s reliance on the A3 capacity improvement is foolhardy in the extreme. Not proceeding with the Blackwell Farm development would be a far superior option.

24. The Council recognises that the Blackwell Farm development cannot proceed until the A3 has been widened, but realises that this cannot be achieved until, at best, near the end of the Plan period. As a result of the lack of progress in agreeing A3 capacity increases, the rate of provision of houses in Policy S2, which was back-end loaded in the 2016 Proposed Submission, is now in the 2017 Proposed Submission still more heavily skewed towards the end of the plan period. The 2019-20 provision has been dropped from 500 to 450, while the annual provision in the last three years of the Plan has been raised from 790 to 850. There is insufficient evidence to show that 850 dwellings per annum could be constructed and sold in the Borough in those last three years: the numbers reflect not how the housing market works, but the contortions which the Council has gone through to square its housing provision numbers with the aspirational timetable for the widening of the A3. A far superior option in both housing and transport terms would be to abandon both
the Blackwell Farm development and the A3 widening (which in part is justified by Blackwell Farm as well as facilitating it).

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

Attached documents:  
- 226389 - Sketch drawing ‘Initial Junction Arrangement’ provided by University of ....pdf (210 KB)  
- 2017-06-28 TN02.pdf (254 KB)  

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

Access from the A31 Hogs Back

Junction with the A31

25. The principle of a new signalised junction on the A31 to facilitate access to Blackwell Farm is project LRN3 in the Infrastructure Schedule. The Plan accompanying Policy A26 Blackwell Farm is unchanged from June 2016. It continues to show a road access at a widened junction of Down Place with the A31, passing over the A31 slip road onto the A3 northbound. Our response to the June 2016 Consultation demonstrated, in a commissioned report from transport specialists, that the proposed signalised junction at Down Place with the A31 would be most unlikely to function effectively. Furthermore, Surrey County Council’s Strategic Highway Assessment Report June 2016 shows that the new junction would cause all users on average a 35 second delay compared with no junction (Table 4.11). In the last twelve months the Borough Council has been forced by a Freedom of Information request to release a sketch map provided by the University of Surrey showing the latest proposals for this access. This involves a junction slightly west of the site originally intended but shows no distance measurements. It shows too an extra westbound lane for traffic on the A3 over-bridge but no bridge widening. Further proposals exist for this junction but have been denied to Save Hogs Back on weak excuses. Also, there appears to be no proposal to co-ordinate this junction with improvements to the Down Lane junction on the opposite side of the A31 slightly to the east, even though the creation of the Down Place access could ordinarily be expected to generate significant additional use of Down Lane.

26. The lack of transparency by the Council is significant: unless demonstrated otherwise, we consider that the proposed access at Down Place is likely to remain impractical for the following reasons.

- There does not appear to be sufficient road width for the proposed junction.
- A signalised junction is likely to be over-capacity at peak periods.
- Travellers leaving Blackwell Farm this way in the morning peak will suffer major tailbacks due to the overloaded A31 eastbound inhibiting left turns (the peak flow direction).
- Widening of the A3 over-bridge may well still be necessary at vast cost.
- Only a very environmentally damaging roundabout in the AONB on the top of the Hog’s Back (previously opposed by Borough Councillors) could be sure of accommodating likely flows.

Access road between the A31 and Blackwell Farm

27. Project LRN4 in the Infrastructure Schedule is an access road at Blackwell Farm with a through link to Egerton Road. The Plan continues to give the misleading impression that “The design of the improved Down Place access road or a new
adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV” (Infrastructure Requirements item 2). A significant road connecting to the A31 could not possibly be achieved by an ‘improved Down Place access road’, the route of which is narrow, lined by mature trees on both sides, and includes a significant sharp bend, while any alternative could not possibly be sympathetic to the AONB and AGLV. The construction of an access road through an AONB to a new urban extension would be major development in its own right. This could only be justified in AONB policy terms if there were exceptional circumstances. There are none of these and none are claimed or demonstrated.

28. The principal difficulty which has arisen in the last year regarding the new link road is that the Council has been unable to find a workable solution for the local road network. The Council wants residents of Blackwell Farm and employees at the Research Park and its proposed extension to be able to enter and leave either in the Guildford direction or the A31 direction, but it does not want most other drivers to use the same roads if they don’t really need to be there. There appear to be two intentions: to constrain drivers who are just passing through – so as to avoid rat-running (especially necessary if a direct through route can be found south of Manor Copse) – and to avoid attracting drivers who currently use Egerton Road. In both cases the intention is to avoid causing adverse network effects if drivers divert onto the new link, e.g. rat-runners overloading Egerton Road still further, or the new access prompting more traffic on the A31.

29. Policy A26 in the June 2017 Proposed Submission Local Plan sets out its solution: to provide a new route “between the A31 Farnham Road and Egerton Road” for “employees and emergency vehicles” (only) to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital. We address in this section the practicability of selecting users for the public highway. However, the matter is also linked to the separate issue of how to link Blackwell Farm into Egerton Road, the main road into Guildford (see paragraphs 47-50).

30. We have tried for the last year to obtain from Guildford BC and the County Highways Authority an understanding of exactly how users of the proposed new road network would be restricted to those people deemed suitable, with everyone else barred. No credible explanation has been provided. The matter is completely ignored in the Borough Council’s Topic Paper: Transport (June 2017) and Strategic Highway Assessment Report Addendum (June 2017), and is restated but not explained in Guildford Borough Transport Strategy 2017 (June 2017). This is an issue which cannot be brushed under the carpet because it lies at the heart of the credibility of the link to the A31.

31. The local authorities have been thinking about the issues raised but failed to find an answer after another year of investigating. Surrey County Council has indicated that its preferred option is the use of Automatic Number Plate Recognition (ANPR) coupled with a permit system. However, there is a general right of public access on the public highway without the State snooping on who uses it by means of cameras, so the legality and practicality of any control system remains to be resolved. For this method to function, therefore, we anticipate that cameras would have to monitor passage on private roads, raising the prospect that Blackwell Farm might not be fully accessible on the public road network. It remains unclear what would happen to drivers whose number plates were not ‘authorised’ to use the road, or how they could be discouraged from arriving in the first place. If there was a system of fines for unauthorised use of the road link, this would require the co-operation of public authorities in perpetuity (which would need to have ongoing funding from the development). With private roads, control of the network would be lost to a private interest whose priorities might not always be the same as those of a public authority. Rights of access to the private roads could at any time be changed by the landowner by reference to which vehicles were allowed passage, when, at what cost, or in other ways. We would expect an urban extension to Guildford reliant on access and egress by private roads to be fundamentally unacceptable.

32. It is unclear whether Guildford BC appreciates the impracticability of the proposed differentiation between acceptable and banned users of the road. There will be thousands of ‘legitimate’ drivers resident in the Blackwell Farm housing development. There will be many hundreds of employees in the Research Park and its proposed extension. There will be hundreds of staff on the Manor Park campus and at the Hospital. Identifying these individuals and, specifically, the cars they will be driving would be a nightmare, made worse by staff turnover and churn in the occupancy of the housing development. Legitimate individuals may have good cause to use alternative cars. The newly introduced secondary school would be largely (two thirds) for the benefit of non-residents of the Blackwell Farm development, so large numbers of drivers can be expected to arrive from elsewhere using the link road, and would need to be registered. Many others will claim legitimate cause for registration on the ANPR system, such as staff at the Nuffield Hospital as well as the County Hospital, employees of shops and services in the area, taxi drivers and so on. The system of registration
would become very large and unwieldy, requiring continual (and rapid) update, at real cost. A reliable and effective appeal system would be needed, but the frustrations of both registered and especially non-registered users of the road are still entirely foreseeable.

33. As the transport consultant to Compton and Worplesdon Parish Councils notes, the inevitable complexity of an ANPR process raises a series of questions related to site deliverability such as:

1. Will the developer provide for the financial enforcement costs of the link road restrictions in perpetuity? Is this included within the £20million cost for LRN4?
2. Will Surrey Police provide the enforcement of the ANPR in perpetuity?
3. How will all of the people who will be granted access to use the road be differentiated from through traffic?

34. Answers to these questions and resolving other practical concerns are fundamental to the successful deliverability of the vehicular link road and the urban extension as a whole. The road must not attract unwanted road users, but must still achieve the aim of serving all of the desired users. So far the Council has offered no commentary at all on how these awkward issues might be resolved, or on how the use of private roads to achieve a public purpose can be made to function without unacceptable risks of unilateral action by the landowner.

35. The outcome seems to us clearly inevitable if a link road is built. It will not be workable. Instead of a costly system of registration, fines, appeals, etc., the greater likelihood is that the foreseeable cacophony of opposition to a system which appears indiscriminate, unfair and ineffective will cause the system of ANPR and registration to be abandoned in a short order of time. All the disadvantages of the link road to the wider network would then be realised.

Impact of the link road on air quality in Compton

36. New information on air quality has become available since the consultation on the Proposed Submission Local Plan in 2016. In particular, Guildford Borough Council has issued an admirably brief and clear 2016 Air Quality Annual Status Report, September 2016. This shows that a specific area of the B3000 road through the village of Compton (in whose parish Blackwell Farm partially lies) has one air quality monitoring position which consistently reveals concentrations of Nitrogen Dioxide (NO2) well in excess of the legal limit adjacent to a dwelling (and the highest figure in the Borough). This is the only location in the Borough where this combination arises. (There were two other places with lesser exceedance of the legal limit, but one was located well away from dwellings and the other was unreliable having only 33% data capture rather than the 75% required.) Other monitoring positions nearby in Compton had NO2 pollution approaching the legal limit.

37. There is no doubt whatever about the cause of the pollution problem: through traffic passing through the village. Large numbers of cars pass through and lorries on the relatively narrow road can cause additional congestion. Further monitoring and modelling is taking place to ascertain whether any further action is required, notably using Advanced Dispersion Modelling Software (since June 2016). The Guildford Borough Transport Strategy 2017 reports that in respect of Compton “The Council is considering whether to declare an Air Quality Management Area and, working with Surrey County Council, will use the results of an ongoing study looking at the pattern of daily exposure to design and implement appropriate mitigating measures” (page 19). The Council has proposed no means of achieving in the short term a permanent reduction in traffic volumes through Compton. On the face of it, an AQMA may well therefore already be needed: under its legal duties the Council must designate one if it is unlikely that the objective values (i.e. less than 40g/m3) will be met in a given timescale, and the Council must then prepare an Air Quality Action Plan (AQAP) with the aim of achieving value objectives.

38. The vehicle count through Compton will rise alarmingly if the Blackwell Farm development and the associated A3 widening are built, inevitably necessitating an AQMA and with little or no prospect of an AQAP being effective. For vehicle impacts, the SHAR treats development of Blackwell Farm and accesses to it as a two-stage process: ‘Scenario 3’ involves the construction of key highway schemes providing access to large development sites (incl. Blackwell Farm) and local highway schemes, while ‘Scenario 5’ involves the widening of the A3 at Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction). The traffic consequences of each are modelled separately. In practice, as established in paragraph 12 above, there is common ground between the Borough Council, County Council and Highways England that the Blackwell Farm development cannot proceed until the A3 has been widened, so in practice the highways impacts of the site access road and A3 widening are additional if Blackwell Farm is to proceed.
39. The SHAR shows in Figure 4.3 for the morning peak hour that 275 vehicles will leave the A31 at Down Place (for Blackwell Farm, the Surrey Research Park and County Hospital). Paragraph 4.7.5 suggests that these are trips which primarily have their origin in the west, (though the likelihood is that many of them will have actually their origin in the south: traffic from Godalming and Farncombe, for example, could access the A31 at the Puttenham junction and then head for the Research Park or Hospital while avoiding Guildford.) In short, a proportion of the 275 vehicles using the Down Place junction under Scenario 3 will have passed through Compton. Unfortunately, the network effects diagram shown in Figure 4.3 does not extend southwards to Compton to identify an indicative number.

40. The SHAR then indicates the impact of Scenario 5 compared with Scenario 3. This is reported for Compton in Table 4.5, showing that the B3000 through Compton will have one of the highest absolute increases in flow arising from the widening of the A3, with an additional 145 vehicles per hour in the morning peak, representing a further 16% increase in traffic through Compton. The Table notes that both under Scenario 3 (even without the A3 widening) and under Scenario 5 the Level Of Service on the road would be category E: ‘Unstable flow operating at capacity’. The outcome could be even worse: the SHAR notes at paragraph 4.7.5 that potentially the number of drivers attracted to use the new Down Place to Blackwell Farm link could be somewhat higher as the model cannot accurately reflect the queuing that occurs on the nearside lane of the A31 as it approaches the merge with the A3. If so, the numbers passing through Compton could be expected to increase proportionately.

41. The evidence is clear that the combined effect of the Local Plan’s proposals for the Down Place link road to Blackwell Farm and the A3 will greatly increase traffic through Compton which in turn will have an inevitable and appalling impact on air quality (which already exceeds legal limits at one location). Despite this, the Council is in denial about the air quality impacts of its Proposed Submission Local Plan 2017. Aecom have prepared for the Borough Council an Air Quality Review of Guildford Borough proposed Submission Local Plan: Strategy and Sites “June 2017”; but this completely fails to appreciate the relationship between the Blackwell Farm development, the proposed road infrastructure developments and air quality at Compton. It provides a series of unwise statements:

(i) “it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective in to the future, without additional measures being required locally” (section 2.3). The reference to little development in the area is absurd: a major urban extension is proposed in the Parish. The suggestion that technological advances in emissions will solve the problem is fanciful in anything other than the long term, whereas there is an immediate need for action to reduce vehicle passage through Compton.

(ii) “The assessment identified a risk of exceedance if traffic flows, primarily on the B3000, increased. The area was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO2 concentrations measured in the area” (section 4.1). This finding is simply wrong: Table 4.5 of the SHAR anticipates a 16% increase in traffic in Compton from the A3 widening, not counting any increase generated along the Down Place link road.

(iii) A review of Policy A26 Blackwell Farm (section 5.2.2.1) recognises that “A large development such as this is likely to have an impact on local air quality as there are likely to be large changes to traffic flows on nearby roads and thus impacts on pollutant concentrations”, but failed to realise the consequences for Compton, even though this is nearby and clearly the place with the worst NO2 pollution recording in the Borough (which should obviously be one of the first places to examine for air quality consequences).

(iv) A review of the air quality impact of the Local Plan on Compton (section 5.2.4) similarly fails to appreciate the evidence. This states in full: “There is one large land allocation within the parish of Compton, A26 Blackwell Farm, discussed above. The additional traffic flows predicted to be generated by this development are not predicted to have a significant adverse effect on air quality in the area of the village of Compton. There are no other large allocations local to Compton Village. As a result the implementation of the GBC Draft Local Plan should have little effect on future traffic flows through the area and thus negligible impact on local air quality.”

(v) Rather than address the air quality consequences of Blackwell Farm at the Local Plan stage, when decisions can still affect air quality in Compton, Aecom choose to defer any consideration of the issue until a time when little can be done about it. On four occasions in the Executive Summary the issue is recommended as a matter which can be dealt with ‘through the planning application process’. Once allocations of land are made for development, strategic reasons for...
resisting them (e.g. on air quality grounds) are typically overruled as matters which should have been resolved at the plan-making stage. Leaving air pollution consequences of proposed development until the planning application stage is an exercise in trying to sweep the issue under the carpet.

42. Aecom’s recommendations in section 5.4 recognise that “The increase in traffic flows associated with the implementation of the Draft Local Plan are predicted to be in the region of 12,500-17,000 vehicles per day on the Guildford Bypass [A3]”, but seem to assume – extraordinarily – that no extra vehicles will pass through Compton (despite the evidence in the SHAR). In our view, the Aecom report and its recommendations represent a significant failure to respond to clear evidence of the air quality damage that the Blackwell Farm development as a whole and the associated A3 widening would inflict upon Compton, about which little could then be done in the short term. We wholly disagree with its approach, which could threaten life-expectancy in Compton.

43. It is hardly surprising that air quality is barely mentioned in the Sustainability Appraisal and treated as a minor issue, as Aecom also prepared this for the Borough Council: paragraph 10.7.1 final indent merely recommends that ‘detailed modelling’ is undertaken close to where very large increases in traffic flows are expected. Paragraph 10.7.7 concludes “Proposed changes to the spatial strategy have little or no implications for health, whilst proposed changes to site specific policy (particularly regarding air quality; see discussion above), responding to the Air Quality Review (2017), are supportive of good health.” Again key decisions are to be left until too late until the planning application stage, with both the SA (at paragraph 10.7.1) and the Air Quality Review (at page 5) recommending that ‘potential air quality issues’ should be added to the list of ‘key considerations’ at the end of the main urban development allocation policies, including Policy A26 Blackwell Farm. This has been taken up by the Borough Council. However, the SA fails to address the key issue that needs resolution now: how to stop additional traffic being attracted through Compton or reduce it.

**Connection to Guildford**

*Linking the Research Park Extension to the road network*

44. The expansion of the Surrey Research Park and the creation of the Blackwell Farm estate are treated as part of the same development in Policy A26. In access terms it is more sensible to consider them separately. The Research Park proposal is for an Extension of 10-11ha, which would be to the north-west of the current Research Park. Access would be straight-forward from Guildford: via Egerton Road and Gill Avenue, via the roundabout serving the Research Park by the Occam Road/Priestley Road loop, and by making an extension to Stephenson Way. A road serving the Extension could be taken through the mature hedgerow separating the existing Research Park from Blackwell Farm at a point close to and parallel to the railway line. Stephenson Way has been constructed to allow further extension of the roadway in this location (also giving access to some of the last remaining large vacant sites on the current Research Park). Proposals for the Sustainable Movement Corridor in the June 2016 ‘Progress update’ as part of the evidence base for the Proposed Submission Local Plan at that time were consistent with this. They showed in Figure 5 a schematic route for the SMC. This is reproduced on page 16 of the Guildford Borough Transport Strategy 2017. At its western end this turns north from Gill Avenue, apparently to follow Occam Road and Priestley Road, before making a westward thrust into the Research Park extension area (though whether north or south of Surrey Satellite Technology is difficult to say from the scale of the plan provided). So far as the Research Park Extension is concerned, that would seem to be an understandable direction in which to take the Sustainable Movement Corridor.

45. However, this arrangement would introduce development into Green Belt and the setting of the AONB at Blackwell Farm, breach the excellent existing screening of development from the west, add substantial additional traffic to the heavily congested Egerton Road, and in all likelihood be opposed by existing users of the Research Park who would be unlikely to want a significant thoroughfare in their midst. We therefore consider this proposal unacceptable. We note, too, that the proposed SMC may now stop short of the Research Park Extension (at the roundabout on Gill Avenue at the top of the hill), as indicated in the Sustainable Movement Corridor – Update 20 February 2017 in Figure 4. How or whether the SMC would link into Blackwell Farm or the Research Park Extension has become a mystery.

46. We do not accept that the sensibilities of existing staff in the current Research Park should dictate the most appropriate access route to a Research Park Extension. However, if the intention (and this is unstated in the Local Plan) is that the Research Park Extension could only proceed if a new road link was made to it from the A31, to avoid access only through the existing Research Park, there would be even less justification for the development going ahead. Not only would the scheme still intrude into Green Belt and the setting of the AONB at Blackwell Farm. It would also be partly
responsible for requiring major development of a road in the AONB and so could only be justified in ‘exceptional circumstances’ (which it has neither claimed nor demonstrated). Given that the Extension would now be physically separate from the existing Research Park, it would be unable to claim Blackwell Farm as an essential location. So far as we can see, the Extension does not need to be in this location at all, and a more fundamental review of its future location would be in order. That would also help avoid traffic growth on Egerton Road.

**Linking Blackwell Farm to Egerton Road and the Tesco roundabout**

47. How the Borough Council and the County Highways Authority propose to link the Blackwell Farm development into Egerton Road preferably via Gill Avenue, in accordance with the Proposed Submission Local Plan 2017 Policy A26, remains unclear. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. One option has recently been lost by the construction of the substantial School of Veterinary Medicine on the line of one possible access road. We consider the Proposed Submission Local Plan to be derelict in its duty to demonstrate how such a major urban development on the edge of Guildford can in reality be linked into the fabric of the town. The Borough Council is plainly having great difficulty finding a suitable access route. We strongly recommend that the Local Plan should not be submitted for Examination unless this route can be clearly identified first.

**Impact of Blackwell Farm and the Research Park development on the local road network**

48. Egerton Road is one of the worst congestion hotspots in Guildford and the wider area. Egerton Road provides the main access to the Surrey Royal County Hospital and a superstore, and the only access to Surrey University’s Manor Park student village, Surrey Sports Park and the entirety of Surrey Research Park. The demand for access to all these destinations is growing, notably with building programmes at Manor Park and the Research Park. The high level of existing congestion will therefore get worse, even before Blackwell Farm is contemplated. Egerton Road is accessed principally from Guildford to the east but its capacity is fundamentally constrained by the pinch-point of the A3 underpass, which is a single-carriageway road capable of providing for two lanes of cars each way (but not wider vehicles). Overloading of the roundabouts at either end of the underpass, which both have links to the A3 and other destinations, also act as pinch-points for traffic from numerous sources and cause traffic to back up onto the roads into them (even onto the A3). The likely additional traffic generation at the Egerton Road/Gill Avenue crossroads, immediately west of the Tesco Roundabout, was noted in paragraph 6 above.

49. The concept of adding the major Blackwell Farm estate and a 10-11ha Research Park extension, both accessed from Egerton Road, without any significant vehicle capacity increase on Egerton Road itself, seems astonishing to the point of being hardly believable. The Strategic Highway Assessment Report June 2016 accompanying the Proposed Submission Local Plan a year ago states of the Blackwell Farm development: “in Scenario 2, without either new highway schemes or specific access arrangements, trips from Blackwell Farm load onto the A31. But with the access arrangements modelled together with an access road through the development to the Surrey Research Park, this assessment indicates that significant pressure could be placed on Gill Avenue, the Hospital junction and other parts of the network in that area” (paragraph 4.5.4). Paragraph 4.9.5 of the SHAR specifically identifies that “the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.”

50. In addition to this, in the last twelve months, the Proposed Submission Local Plan 2017 has upgraded the importance of Egerton Road to the purpose of providing access to Blackwell Farm, compared with the 2016 Plan, in that the alternative proposed access to Blackwell Farm via the A31 is no longer designated as the ‘primary’ access and Egerton Road is no longer designated the ‘secondary’ access. They now have equal status. Whereas this properly reflects the implausibility of an acceptable link to the A31, no change whatever has been proposed to Egerton Road to accommodate such extra traffic as may now be expected to take this route (which is unspecified). In our view, the additional traffic congestion impacts on an already overloaded local network are so foreseeably dire that we strongly recommend the Blackwell Farm development should not be taken forward.

*Sustainable Movement Corridor*
51. Back in 2014 Arup prepared a report **Guildford Town and Approaches Movement Study** for the Borough Council, a vision statement on transport in Guildford to 2050, which included a very broad indicative route at a scale that was difficult to apply on the ground. This has been endorsed by the Council. The purpose was to facilitate sustainable movement, strongly emphasising public transport, walking, cycling and demand management at the expense of travel by private car. The centrepiece of the scheme was a corridor segregated to be available to fast buses (and possibly trams), cyclists and pedestrians, linking the key existing areas of the town that are drivers of growth. There would be new bridges over the railway (in the town centre) and over the River Wey (across the floodplain near Stoke Lock). The estimated total cost was broadly £75-100 million though clearly not costed in detail. Cars would be banned from the Corridor which, because it would be based on using existing roads, some of them major roads, would represent a highly significant reallocation of space away from cars to buses, cycles and walkers, with consequent impediments to car usage. Car parking charges would be increased, 20mph zones introduced, some roads be closed to through traffic and others pedestrianised. The Proposed Submission Local Plan supports this kind of corridor but, strikingly, none of these intentions and assumptions is made clear in the 2016 or 2017 Consultations.

52. The 2016 Consultation proposed a Sustainable Movement Corridor, included in the Plan at the last moment (Spatial Vision, Policy I3 and paragraph 4.6.24). Various land allocation policies required co-ordination with the Corridor. Paragraph 4.6.24 explained that the Sustainable Movement Corridor would link major developments to Park-and-Rides, including Blackwell Farm (at its western end), and stated that the Corridor would be ‘largely on existing roads’.’ ‘Route sections’ were listed in the Infrastructure Schedule (Appendix C) with six itemised segments with some broad cost figures suggested (£80-90m in total). No route for the Corridor was included in the Plan, but instead the evidence base included a Progress Update on the Sustainable Movement Corridor scheme (GBC, June 2016). This showed a revised figurative route and possible road layouts at some key junctions and sections. It showed variations from the Arup study, notably with: a spur to Slyfield based on the existing A320 rather than a river crossing further east and also a lengthy new corridor up the A3100 to Gosden Hill Farm. The Arup Corridor would be downgraded in many lengths to shared roadspace with existing traffic (i.e. normal roads) but with bus priority measures. A land bridge over the A3 to provide a connection to the Research Park was downgraded to using the existing Egerton Road underpass: the recommendation was “to consider further the potential for tidal bus lane on Egerton Road as it passes under the A3 trunk road, with signalised control at either end controlling its use by buses, whilst retaining two working lanes of general traffic. It would be anticipated that the tidal bus lane would be used westbound in the morning peak period and eastbound in the evening peak period.” Changes to the Tesco roundabout would also be needed. Development would begin in the town centre and be phased later for other sections (to 2033).

53. The 2017 Consultation has made little progress on the Sustainable Movement Corridor. Policy ID3 now mentions a Supplementary Planning Document on the topic, but there is no sign of this even in first draft despite the passage of another year. This is an unacceptably inadequate basis upon which to plan for major urban development at Blackwell Farm. However, a further report Sustainable Movement Corridor – Update published in February 2017 does for the first time include a published small-scale street map on which the Sustainable Movement Corridor (SMC) is superimposed and clearer proposals for an initial western section. However, the Council clearly have insufficient confidence in this to include it in the Local Plan. The 2017 Update shows changes from the 2016 Update, notably with an additional crossing of the railway beside Yorkie’s Bridge and an additional north-south corridor along Woodbridge Road and Onslow Street between the A25 and the gyratory.

54. The Sustainable Movement Corridor will measure its effectiveness by a substantial degree of modal shift away from cars and towards sustainable transport modes. The starting point for analysis is that the Strategic Highway Assessment Report 2016 assumes no modal shift to sustainable modes, and so is a ‘worst case’ in respect of cars (paragraph 4.1.8). Paragraph 4.6.28 of the Proposed Submission Local Plan 2017 now states that “the site allocations and proposals in this Plan – including the significant programme of schemes to provide and improve opportunities to use active modes, bus and rail – are intended to result in a modest modal shift over the period to 2034”. However, the Council has accepted that this is unlikely to be enormously effective: the same sentence continues “we forecast that there will also be an absolute increase in overall traffic volumes.” Instead the paragraph proposes to ‘increase highway capacity’. This is a downgrading from the intentions just a year ago, when paragraph 4.1.8 of the SHAR stated “The impact of these sustainable transport schemes is expected to be significant”. What, therefore, is the Council’s objective?

55. The key section of the SMC for Blackwell Farm is the western section. At the key pinch-point of the A3 underpass, the Sustainable Movement Corridor can only function if the existing four lanes for vehicles are reduced to three, with one of these lanes taken up as a bus lane based on tidal flow routing. Space for other vehicles would be halved. The Proposed
Submission Local Plan 2017 together with the main transport documents supporting it (the Guildford Borough Transport Strategy 2017 and Topic Paper: Transport, June 2017) are silent on whether this will be implemented, but as it is a key feature of the SMC, which could not function without it, we assume that this is what is proposed. Furthermore, the Tesco roundabout diagram in the 2017 Update document shows no roadspace at all reallocated to the Corridor west of this point.

56. The Council does not appear to have modelled the network consequences of creating the western section of the SMC (or any other section). With the Blackwell Farm development completed, the SHAR forecasts (Figure 4.3) that, in the morning peak hour, there would be 837 movements westbound and 636 movements eastbound along Egerton Road through the underpass (one vehicle about every 4 seconds and 6 seconds respectively). The underpass is highly unlikely to have the capacity to accept this level of traffic on a single lane each way. That would still be the case after modest modal shift had reduced the vehicle counts somewhat. It seems to us unrealistic to believe that all traffic inhibited by denial of road space will divert to sustainable modes. The more likely effect is that the SMC will simply add greatly to the predicted overcapacity on Egerton Road, with knock-on effects through the network. The principal effect of the SMC in the Blackwell Farm area is therefore likely to be to make traffic congestion worse rather than better if the development is built.

57. The footpath and cycleway on the north side of Egerton Road, segregated from traffic but not from each other, would be maintained under the proposals in the 2017 Sustainable Movement Corridor – Update, though the current design is cramped and mostly unattractive. The footpath and cycleway cease east of the Tesco roundabout, so walkers and cyclists have to fend for themselves when crossing the Ashenden Road arm of the Tesco roundabout. No improvement even to this basic problem is proposed in the Plan. The Plan needs to be clearer about what if anything it is actually proposing in order to encourage walking and cycling to and from the Blackwell Farm development.

58. If the modal shift fails to happen, the level of congestion in Guildford will become significantly worse. Modal shift is the only means by which the Council can find any practical means of moving additional people at scale into and out of Blackwell Farm (and the associated 10-11ha expansion of the Research Park). Even so, given the existing very high levels of congestion and over-capacity on Egerton Road and Gill Avenue, especially in peak periods, there is no certainty that there will be sufficient roadspace for vehicles, people and goods to reach the Blackwell Farm development even after the Sustainable Movement Corridor has taken a proportion of travellers (itself taking up roadspace).

59. The Council has not demonstrated a credible strategy for actually achieving modal shift in practice, notably by removing both roadspace for cars and destination car parking spaces. Modal shift is not mentioned in Policy A26, despite its imperative importance to the delivery of Blackwell Farm. The strong impression given by the Plan is that the SMC has been greatly downgraded from the original proposals by Arup to which the Council subscribed, and is therefore unlikely to deliver the modal shift which is essential for the development proposals in the Plan to be feasible. It seems to us that the likelihood is that the Sustainable Movement Corridor in the Blackwell Farm area will be massively inadequate. As the Council’s heart does not appear to be in modal shift, we consider that the Blackwell Farm proposal will be undeliverable and we recommend that the proposed allocation in Policy A26 is withdrawn.

60. The purpose of the SMC can only be achieved by upsetting car drivers. However, the Plan strongly emphasises accommodating traffic generation from proposed development with figures apparently incorporating: no modal shift at all; a sustained aspiration for a major increase in capacity on the A3; and continued investment in local road capacity improvements. We conclude that the Sustainable Movement Corridor has already been compromised, will fail to make discernible impacts on existing congestion, and will therefore not have anything like enough impact on travel patterns to accommodate the people and goods movements arising from 1,800 houses at Blackwell Farm. We recommend that the Local Plan should not be submitted for Examination without deletion of the Blackwell Farm proposal in Policy A26.

Funding the transport infrastructure necessary for Blackwell Farm

61. We pointed out in our submission a year ago that the scale of financial support expected from the developers of the Blackwell Farm site for the delivery of road infrastructure alone was far above the amounts normally expected. In the last year the obligations upon them have increased. The Proposed Submission Local Plan has now been amended in the Infrastructure Schedule in Appendix C. Proposals affecting the A3 were noted in paragraph 20 above, to which Blackwell Farm developers will be a party. Other new financial commitments specific to Blackwell Farm are:
• Project BT6 ‘Significant bus network serving the Blackwell Farm site and key destinations including the existing western suburbs of Guildford and the town centre to be provided’ is a new requirement in 2017, which must be entirely funded and delivered by the developer, at a price which is still to be confirmed, and therefore an open-ended commitment at present;
• Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’, which must be entirely funded by the developer, has seen its cost increase from £5m to £10m;
• The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN3 ‘New signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)’, which is likely to increase financial obligations on the developer;
• The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN4 ‘Access road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)’, which is likely to increase financial obligations on the developer;
• The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’, which is likely to increase financial obligations on the developer;
• A “Necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station” towards the estimated £10m cost of Project NR2 will still be required from the Blackwell Farm developer (the only named developer required to contribute) in accordance with Policy A26 Infrastructure Requirement (7): this assumes greater importance now that the station merits its own Policy A59 (see paragraphs 63-64 below);
• The funding arrangements for SMC1 Sustainable Movement Corridor: West have been amended slightly. The change states the funding source will be ‘Developer funded and Local Growth Fund’ instead of ‘Developer contributions and Local Growth Fund’, suggesting that the developers will have to fund somewhat more than previously expected. The Blackwell Farm development will be the principal contributor to this section of the SMC.

62. Transport consultants advising Compton and Worplesdon Parish Councils calculate that the transport infrastructure alone for the Blackwell Farm development will cost about £60million, most of it up-front. This is around £35,000 per dwelling. There will be other major costs which the developer will be required to fund, including new primary and secondary schools and affordable housing (none of which were included in our previous costings), all of which can be very expensive, and numerous other mitigation costs from such a major development. There is, therefore, a real risk that the proposed development will not be viable and deliverable. If still included, the Local Plan would need to ensure that the Blackwell Farm development complies with paragraph 173 of the NPPF on this point. In reality, in the absence of other funding sources to provide money which the developers may be unable or unwilling to provide, the Blackwell Farm scheme would have to fail and be deleted from the Plan.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5272</th>
<th>Respondent: 9335041 / David Reeve</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).</td>
<td>I OBJECT that this proposed development actually borders on the AONB, which makes a complete mockery of the designation. It is also exceptionally disturbing to find that there appears to have been a deliberate effort to remove Blackwell Farm from consideration of a boundary review of the AONB.</td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT on the grounds that (in conjunction with other sites) this proposal would lead to – or certainly facilitate – an almost continuous ribbon of development along the A3.

Finally, I STRONGLY OBJECT that Guildford proposes to wreck the view of a nationally known landmark in the form of the Hog’s Back.

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

Attached documents:

Comment ID: pslp172/3108  Respondent: 9408833 / Carol Herzig  Agent:

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

I would like to make my objections to the latest draft of the Local Plan based on the following points. The Local Plan:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]. The scale of the development planned would necessitate sewage trenches, water pipes and gas lines being laid, presumably across existing areas of common land, especially Broad Street Common, which would further damage the fragile balance of the ecology of the area, disrupting wildlife habitats and inevitably forcing some fauna to find alternative sites. Additionally the need for access roads into the area, as well as the cementing and tarmacking of the housing and school site would further impact the drainage of the run-off water from the Hogs Back, increasing flooding risks both into Broad Street village and more immediately into Applegarth Avenue, homes which have been flooded even in recent years due to surface water drainage being inadequate during times of exceptional rainfall.

I would also like to make the point that by creating a housing development on the site of Blackwell Farm (which was vacated by the UniS Vice-Chancellor on the grounds of the subsidence problems of the area, the ground being a mixture of clay and the edge of the chalk ridge) which is currently in the Green Belt, there must be ‘exceptional circumstances’ to use this site in preference to other non-Green Belt sites.

Only this week, I read that the Rokers site, at Fairlands Farm, Holly Lane, was rejected by councillors on the grounds that it was an “inappropriate development” within the green belt and because the development failed to mitigate its impact on infrastructure. According to the report, planning officers also warned of the potential adverse impact on the habitats, flora and fauna withing the Broad Street and Backside Common Site of Nature Conservation Interest (SNCI) – both of which equally form a very important and ancient wildlife corridor with the Blackwell Farm site under consideration. It was also stated that councillors consider it important to look whether ‘inappropriate development’ of a green belt site can be justified by exceptional circumstances. It was seen that this was not the case – yet the development of the Blackwell Farm site is massively greater and will impact not only the immediate community, the character of the landscape, the protected species – yellowhammer, skylark among others – but will furthermore have the following detrimental outcomes:

- It will direct 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. This will directly negatively affect the emergency service response from the hospital
- It 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]
- It will add to air pollution in neighbouring areas, which already exceeds safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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]
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- 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 for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
| Comment ID: | pslp172/279 | Respondent: | 10446721 / John Selves | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 | |
| 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: | PSLPS16/5681 | Respondent: | 10541313 / Ann Medhurst | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 | |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ), is Sound? | ( ), is Legally Compliant? | ( ) |

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

Attached documents:
I also am entirely opposed to the University Plan to build a vast number of houses on land at Blackwell Farm. I did query the building of the Sports Centre and although it is very nice, is it really used to the full potential by the University and local area? If houses or student flats had been built instead we would not be in such a crisis situation now with lack of available accommodation. I certainly do not agree with vast swaths of the Hog's Back being turned into a housing estate. However, a few three story flats at the lower end would not have such an impact and as there is such a need I would agree with that idea.

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

Attached documents:

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Comment ID: pslp172/640  Respondent: 10545793 / David J Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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Comment ID: PSLPS16/490  Respondent: 10569473 / Laura Gold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Supportive of public tenure pitches as it is easier and provides a level of control.

Support that GBC allocate and manage the pitches as it ensures fairness and tenure security. Support inclusion of garden provision and softer landscaping.

Utility blocks are necessary as no one will want to live somewhere without a utility block and the site will end up being a transit site No facilities of space within a mobile home for washing facilities. If a family could afford a unit with wash facilities, it is likely they would be on a private site anyway.

Strongly support the need for inclusion and breaking down of barriers, particularly for the children.
Agree with softer landscaping to resist isolation.

If outhouses or utility blocks are not including, outbuildings will be built anyway.

Support phasing of the sites.

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: PSLPS16/2105  Respondent: 10650945 / Claire & William Field  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park ad a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

Attached documents:

Comment ID: pslp172/720  Respondent: 10653633 / J L Stainer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We 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:

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

Attached documents:

Comment ID: pslp172/5015  Respondent: 10719937 / John & Jean Rudder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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

Attached documents:

Comment ID: pslp172/4828  Respondent: 10723745 / H. Fotheringham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/3875  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to the proposal for 1850 houses at the Blackwell Farm site for reasons similar to Wisley Airfield and Gosden Hill. There can be no justification for any of these three sites. There is no demonstrable need, no exceptional circumstances and, even if there were, brownfield land should be built on rather than the Green Belt.

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

Attached documents:

Comment ID: pslp172/4797  Respondent: 10742433 / Carol Booth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/1023  Respondent: 10746369 / Y. Quittenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
<table>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
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- add to Guildford's pollution.

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

**Attached documents:**

<table>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/3527  Respondent: 10775169 / Caroline Grafton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/4109  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: pslp172/4876  Respondent: 10790241 / Donatus Prinz Von Hohenzollern  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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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Attached documents:

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Comment ID: PSLPS16/393  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Object – AONB and concerns over access to A31 and local roads

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

Attached documents:

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Comment ID: pslp172/423  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/427  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: PSLPS16/7934  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to policy A26 Blackwell Farm There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

1.1.1 Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development

1.1.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

1.1.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to
the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities.

The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. WE question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils.

Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance, and to make this the main access to the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital.

WE question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” WE consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

Attached documents:
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Attached documents:

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Comment ID: PSLPS16/6029  Respondent: 10806113 / Jane Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I OBJECT to any development at Blackwell Farm. Green belt land and AONB should not be used for building. The council should be advocating the use of existing brownfield sites & insisting that areas which already have planning are developed, rather than continuing to sit vacant....

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

Attached documents:

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Comment ID: PSLPS16/2259  Respondent: 10807841 / Bernard Stutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: | PSLPS16/3125 | Respondent: | 10808833 / David Brandon | Agent: | Vail Williams (Suzanne Holloway) |
|-------------|--------------|-------------|-------------------------|--------|---------------------------------
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( Yes ) |

Please see attached statement in relation to Policy A26, Blackwell Farm.

Comments also refer to the relevant evidence base documents and strategic policies.

**Representation against A26: Land adjacent to Blackwell Farm, at Wellington House, Hogs back.**

**1.0: INTRODUCTION:**

1.1 Vail Williams have been appointed as planning agents for Mr David Brandon as landowner of Wellington House, Hogs Back GU3 1DE. This representation is our clients response to the Guildford Borough Council Regulation 19 Submission Local Plan, June 2016 which will guide development until 2033.

1.2 This representation builds on the submission at the Regulation 18 stage of the Local Plan in September 2014, reference DLPSA/3565, and relates to a 4.2 hectare residential site to the west of Policy A26 (site 60 as identified in site assessment documents) as allocated in Guildford Borough Council Local Plan Submission Plan (GBCLP). For site boundaries of the allocation and the proposed site see Appendix One.

1.3 This representation seeks to demonstrate that our clients’ site, is deliverable, suitable and achievable for residential development in line with para 47 of the NPPF and the opportunity to allocate the site for additional residential development, would enhance the existing allocation, and provides a unique opportunity to enhance housing delivery without detriment to the surrounding area.

**2.0 SITE CONTEXT AND OPPORTUNITY:**

2.1 The site comprises of one large U-shaped 2 storey residential property with access road and is surrounded by residential garden. To the west is a significant mature treeescape that forms the boundary of the site, and a robust means of enclosure and natural boundary with the land to west, identified as greenbelt. The site has one owner and is available and suitable for residential development.

2.2 This site is adjacent to the Blackwell Farm allocation, a 78 hectare site which is approximately 500m from the settlement boundaries of Guildford town. To the South of the site is the A31 which forms the main access to the house, and is the primary access to the allocation to the north. There is a separate 2 storey residential property “The Gardens” immediately to the North.

2.3 This representation seeks to demonstrate that approx. 100-120 additional dwellings can be provided on the land adjacent to the primary access road at Wellington House, through the use of the residential house and its garden only. In this regard, a small scale extension to the proposed urban extension would result in only a 5.3% increase in site area, however the opportunity to deliver a more comprehensive development without undermining the context or character of the surrounding area can be achieved.
2.4 With a presumption in favour of sustainable development, this representation seeks to demonstrate how the objectives of the national policy framework (NPPF) and local planning policies (GBLP) can be consistent with the inclusion of the site into the strategic extension site under policy A26 at Blackwell Farm.

3.0 PREVIOUS POLICY CONSIDERATIONS & REPRESENTATIONS IN RELATION TO REGULATION 18

3.1 The site was previously proposed at the Regulation 18 stage on behalf of the landowner, Mr Brandon by planning consultants D&M Planning. The site is defined within the Guildford Borough Local Plan Proposal Map 2003 as being within the Metropolitan Green Belt and in an Area of Great Landscape Value (AGLV).

3.2 The site was proposed at Regulation 18 stage by the landowner with potential for residential development, in a sustainable location and adjacent to the strategic development site proposed by Guildford Borough Council. The site was identified as open countryside and abuts the proposed allocation. Despite numerous concerns raised by objectors regarding the impact on protection policies including the AONB and AGLV, including objections from Natural England, the site immediate adjacent to Wellington House at Blackwell Farm has been allocated as an extension to the settlement boundary and significant development was justified over and above greenbelt, character, agricultural, and access concerns.

3.3 At the Regulation 18 stage, 13,040 dwellings were required (652 per annum) as identified in the 2014 SHMA. The previous representation for Wellington House confirmed that this figure did not reflect the objectively assessed need for housing (OAN) and the housing figures were therefore too low. This then considered alternative scenarios regarding higher growth need, including DCLG figures that proposed a much higher rate of 704 dwellings per annum.

3.4 It is considered that despite the previous representation, the site has not been adequately assessed as part of the land supply assessments, and the proximity to the allocated site and redefined settlement boundary warrants the additional 4.2 hectares, with a clear defensible boundary, to be added to the existing 78 hectare allocation under policy A26.

4.0 CONSIDERATIONS FROM THE EVIDENCE BASE FOR ALLOCATION AT PROPOSED SUBMISSION STAGE (REGULATION 19)

4.1 The Local Plan polices contained within the GBLP submission document, need to comply with the National Planning Policy Framework (NPPF). The plan must demonstrate that it is positively prepared, justified, effective, and consistent with national policy. It is agreed that these tests, relating to the evidence base are sound. However, there are a number of issues raised in regard to the specific assessment of the land supply available for residential development, given that the site at Wellington House has not been included in the site assessments or those housing supply figures cited in the Local Plan.

4.2 Since the Regulation 18 stage, the site allocated at Blackwell Farm has been reduced from circa 2000, to 1800 homes, and the site has been reduced from 106.2 hec to 78 hectare through the loss of land to the west of the access road. For original Regulation 18 Map, see Appendix Two.

4.3 The Local Plan in Policy S2 identifies 13,860 new homes over the plan period (equated to approx. 693 per annum over 20 year plan period). Historically delivery has been low for Guildford and whilst the plan identifies phased delivery from 2018/19-2022/2 with an increasing annual housing target, it is considered that based on delivery rates, the most effective method of ensuring housing targets are met would be to maximise the allocation and identification of sites. Wellington House ensures that this can be dovetailed with the delivery of key infrastructure, which is central to effective planning, and as identified in the Councils own Infrastructure Delivery Plan (June 2016).

4.3 Based on a Land Availability Assessment (LAA) and the study on the June 2016 West Surrey Shared Housing Market Area (SHMA), the requirement for housing based on demographic led projections requires 517 dwellings per
annum, (table 76 SHMA). The fully considered OAN highlights the significant need in the Guildford and its dominance in the wider West Surrey housing market area.

4.4 The Land Availability assessment (Feb 2016) shows that the Blackwell Farm site is due for delivery years 4-15 for 1800 homes, with highest delivery per annum at 230 for years 11-15. It also identifies in the housing trajectory a deficit up to 2028.

4.5 Whilst the SHLAA, and SHMA and Local Plan seem to identify adequate land supply over the plan period, the historic delivery rates, and need to plan positively and flexibly to consider all opportunities for development, in line with para 47 of the NPPF, requires the council to consider and assess all sites. These should be available, achievable (with realistic prospect that housing will be delivered on the site within 5 years) and be viable. On this basis, it is argued that the site at Wellington House should be included as part of the site allocated in Policy A26, on the following grounds:

4.6 Achievable and Deliverable:

The site has only one owner, who has proactively proposed the site as both Regulation 18 and 19 stages of the local plan process, demonstrating positive engagement and consideration of the relevant policy considerations. It is therefore achievable and deliverable.

4.7 Suitable:

The constraints in regard to greenbelt have been removed for the site abutting Wellington House at Blackwell Farm on the basis that the scale and opportunity warrants exceptional circumstances. The additional 4.2 hectare site could increase this opportunity, and indeed already abuts the primary access road for the site, and therefore both the existing mature landscaping and access arrangements are established. Within the LAA, the allocated site at Blackwell Farm (page 428) site reference 311, acknowledges that although the site is in the greenbelt, it partially adjoins the urban area. The small scale extension (approx. 5% increase) could warrant an additional 120 dwellings.

4.8 Again mature trees create a sense of enclosure as with the adjacent site proposed at Wellington House, providing a clear and defensible boundary with mature greenspace. The partial inclusion of the site in AONB and AGLV is acknowledged, however as the site is in a Low flood risk (Zone 1) and as a residential house and garden has no Agricultural land classification, unlike the allocated site, the allocation of the house and its curtilage do not warrant such additional constraints.

4.9 The Sustainability Appraisal (June 2016) states in Box 6.5 the following:

• Blackwell Farm to the south-west performs relatively well as a site option when considered in isolation, relative to other strategic site options, as there is the potential to facilitate delivery of new strategic infrastructure (including a rail station) and enable an extension to the Surrey Research Park; and development would mostly avoid the loss of Green Belt identified as most sensitive (‘red-rated’) by the Green Belt and Countryside Study (GBCS; see Figure 6.4). 31. As such, an urban extension here was identified as a ‘given’ for the purposes of developing spatial strategy alternatives. With regards to site capacity a figure of 1,800 (o.e. a figure lower than that proposed in 2014, reflecting a reduction in the overall site size to avoid red-related Green Belt and AONB, and minimise development on Area of Great Landscape Value (AGLV)) 32 was identified as a given, for the purposes of developing spatial strategy alternatives.

4.10 The Sustainability Appraisal therefore acknowledges that the location and principle of residential development in this location, and the scale of development is consistent with the principles of sustainable development. Para 6.4 of the SA identifies that the site at Blackwell Farm has medium green belt sensitivity. It is therefore considered appropriate in regard to the presumption of sustainable development that the same conclusions could be drawn against increasing the allocation to include Wellington House.

4.11 The Landscape Character Assessment that supports the Regulation 19 Local Plan identifies the site within the Hogs Back Chalk Ridge area B1- where development should have a positive benefit to landscape and have regard to the landscape area. It is considered that this can be addressed through sympathetic design, and use of the site as a blend and transition from the adjacent greenbelt to the site allocation at Blackwell Farm.
4.12 The principle of the assessment of the strategic site, the appropriateness of the development in regards to housing supply and the contribution to the wider priority in the provision of new homes, supports the allocation at Blackwell Farm being extended. The evidence base supports that the site is available, suitable and deliverable, and due to the single ownership of the site it should be considered that there is potential for development to be phased in line with policy approach from the larger strategic site, whilst enhancing housing supply within the early stages of the Local Plan.

5.0 CONSIDERATIONS FROM THE EVIDENCE BASE FOR ALLOCATION AT PROPOSED SUBMISSION STAGE (REGULATION 19)

5.1 The Spatial vision of the Local Plan looks to maintain the extent and function of the green belt in such a way to protect the character of the Borough. The vision then continues to explain that as not all of the development needs can be met within the urban areas, that it is proposed to “focus some development on large greenfield sites, which brings significant infrastructure, it help make it sustainable. In the context of Wellington House, the site would have additionality to this objective, and support the principal of maintaining the greenbelt whilst providing essential infrastructure in a sustainable location.

5.2 The vision also confirms that new development on the edges of existing urban areas will be required to treat the transition from urban to rural character in a sympathetic way, whilst affording great protection to the AONB and AGLV. Careful and considered design can ensure that the redevelopment of the additional 4.2 hectares, can assist in the transition between the allocation and the defined settlement boundary.

5.3 Policy S1 states that the Borough Council will work proactively with applicants jointly to find solutions so that proposals can be approved wherever possible. In this regard, Wellington House is suitable, and achievable fulling sustainable design objectives of the plan and aligning with the presumption in favour of sustainable development.

5.4 Policy S2 confirms the provision of 13,860 new homes, but accepts that “the housing target...is not a ceiling”. Table 1 shows delivery of Blackwell Farm as an urban extension spread across years 1-15, and the policy highlights the annual housing target rising from 500-790 per annum with a total delivery of 10,395. It has already been argued that Wellington House can ensure that as the site is within one ownership, the site can be brought forward in advance of the strategic site, ensuring a more flexible approach to delivery, whilst ensuring delivery throughout the plan period can address an early years deficit. (SHLAA p20)

5.5 Policy P1: Surrey Hills AONB is to be conserved and enhanced, whilst proposals in the AGLV will be required to demonstrate that they would not result in harm. It is proposed that careful design and layout, and containment within the defined boundaries of the site, that align with the western boundaries of the adjacent allocation, would ensure that there any development would not undermine any further the AONB or AGLV but would merely square off the site and allow the transition to be more consistent with the approach taken in Policy A26.

5.6 Policy P2 relates to the greenbelt. The NPPF which states that greenbelt boundaries should only be amended in exceptional circumstances, and given the significant requirement for housing, and the strategic nature of the site for additional employment and infrastructure provision, the Council has considered it appropriate to propose the urban extension site at Blackwell Farm. However, the additional land at Wellington House could also contribute additionality to the housing provision and therefore the same exception can be applied to the site.

5.7 Whilst the council intend to provide an SPD to amplify Policy P2, it is considered that the close relationship with the access to Blackwell Farm and the irregular shape of the existing allocation, is justification for the site to be included in the urban extension. Indeed, the site could be a buffer in regard to design and scale due to its character and typography, and this could then blend with the adjacent green belt. Careful and considered design can easily address this. As the site already has a large residential property within the site, the site has to a degree been previously developed and used, therefore there is a significant difference between the land and its residential curtilage and that of the adjacent open areas that more formally contribute to the green belt and its open character.

5.8 Policy P2 also argues that development on a site, within the green belt, for replacement buildings will look at the scale and proximity to existing buildings. Given the significant scale of the proposals at Blackwell Farm, it is considered that well designed additional residential dwellings on the adjacent site at Blackwell Farm can be justified in relation to the overall visual impact, and that the integrity of the greenbelt would not be undermined by “square-ing off” the urban
extensions allocation in Policy A26. The additional land is therefore consistent with the council reasoned justification in para 4.3.26 which states that infill development should not have an adverse impact on the character of the countryside or the local environment.

5.9 Policy D1 of the submission Local Plan relates to design polices and making better places, and the need to create a harmonious integrated mix of uses. The unique opportunity to expand the scale of the urban extension allows the proposals for the new local centre, employment floorspace, SANG and housing to be enhanced. The site also contributes to the ability to further improve the opportunity for sustainable movement, whilst enhancing housing land supply figures in an already justified location.

5.10 The site at Wellington House would allow any residential development to “respond meaningfully and sensitively to the site, its characteristics and constraints”, whilst being laid out to make the best use of the natural features of the site. In regard to the proposed site, this relates to the opportunity to utilise the topography and natural landscape of the trees and existing mature boundary treatments, which are appropriate to their setting.

5.11 Policy A26 sets out the details of the allocation at Blackwell Farm for 1800 homes, 31,000sqm of employment space, 6 travellers pitches, comparison and convenience retail, community uses and a 2FE primary school. This significant development site abuts the Wellington House site and the shared access road is illustrated to as a primary vehicular access to serve the development. The allocation as it stands will significantly alter the character and setting of Wellington House and not including the site within the allocation ignores an opportunity to further enhance the objectives of sustainable development.

5.12 Other local plan policies:

The site does not have any other constraints that would preclude it from development potential. A planned development has the ability to address the raft of specific policies in relation to sustainable construction, open space provision, energy efficiency and all other local plan requirements through careful and considered design. The site should therefore be considered to be consistent with the NPPF and Local Plan policies.

6.0 Justification of including Wellington House, in line with the National planning context NPPF:

6.1 The NPPF (paragraph 14) states:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

The inclusion of wellington house seeks the opportunity to meet development needs, gives flexibility to the housing land supply whilst the benefits outweigh any harm, that has already been mitigated through the allocation at Blackwell Farm.

6.2 Para 15 states that “development which is sustainable should be permitted without delay.” The site is available and can be delivered without delay as issues relating to access, suitability and sustainability have been established in principle as part of the adjacent strategic land allocation.
6.3 Para 17 of the NNP requires Local Planning Authorities to empower local people to shape their surroundings whilst allowing Local Plans to be “a creative exercise in finding ways to enhance and improve the places in which people live”. It states that every effort should be made to objectively identify and meet development needs.” responding positively to opportunities for growth”.

6.4 It continues, that planning should “take account of the different roles and characters of different areas”. In regards to the Guildford Local Plan, if this has been adequately considered for Site A26, then the approach can be applied to Wellington House to further respect the character of the locality whilst allowing every effort to identify development opportunities.

6.5 The NPPF also encourages the use of previously developed land, whilst actively managing growth to make the fullest use of sustainable transport, and focusing development that can be made sustainable. Paragraph 30 encourages patterns of development that facilitate sustainable modes of transport. Focusing additional growth on the boundaries of the allocation would meet all of the Core Planning Principles of the NNPF, whilst opportunities for sustainable design and construction can be amplified in a larger scale scheme.

6.6 Paragraph 47 of the NPPF requires local authorities to “boost significantly the supply of housing”. and that developable sites should be identified. Through the identification of the Blackwell Farm as a key site, critical to the delivery of housing development over the plan period, Guildford Borough Council has accepted the principle of development in this location, and has justified that this overrides the previous green belt allocation. It does not however identify Wellington House as developable.

6.7 The NPPF requires delivery to be realistic whilst Paragraph 50 also requires policies to be flexible over time. It is considered that due to historical levels of under delivery the inclusion of the additional 4.2 hectares will allow a flexible, realistic and achievable site to come forward, that can be self sufficient, or developed as part of the wider strategic allocation.

6.8 Paragraph 52 states that “the supply of housing can sometimes be best achieved through planning for larger scale development, such as new extensions to settlements.” Whilst the authority has illustrated this in Site 26 at Blackwell Farm it has not done this far enough, and the potential to include Wellington House, ensures that the opportunity “provides the best way of achieving sustainable development”.

6.9 Whilst paragraph 53 resists the use of residential gardens, when it is harmful. Given the scale of the curtilage of Wellington House, of 4.2 hectares and the close proximity to the large 78 hectare site at Blackwell Farm, it is consistent that the supply of additional dwelling houses within the residential curtilage would not cause harm, indeed it could be positively planned to ensure a more consistent approach to the setting and context of the wider site.

6.10 Paragraph 55 requires residential development to be innovative in design, raise design standards, significantly enhance its setting and be sensitive to the defining characteristics of the local area. Due to the defensible boundaries of the site, the unusual shape and form of the allocation at Blackwell Farm and the precedent given to the use of the access road leading to both Wellington House and Blackwell Farm, the opportunity to allow the residential house site to be developed as a buffer to the strategic allocation to the north, can ensure that this is achieved through careful design and layout, respecting the local character and context. This will ensure that the development complies with Paragraph 56 which requires development to establish a strong sense of place, and optimise the potential of the site to accommodate development, responding to local character.

6.11 Four of the five objectives related to greenbelt policy cited in para 80, are to protect the sprawl of built up areas, prevent towns merging, assist in the safeguarding the countryside from encroachment, and preserve historic towns. The principle of the allocation at Blackwell Farm ensures that these have been considered and assessed, against the overriding need for land for housing for period of the Local Plan.
6.12 The extension of the site to include Wellington House can therefore be agreed that the principles of adding an additional 4.2 hectares on a 78 hectare site (5.4% increase) would not undermine the gap between built up areas, nor create the merger of towns. The scale of the site, adjacent to the larger allocation does not result in any additional encroachment eastwards into the countryside, but merely squares off the site, along the already allocated access road that is the primary access to the allocated site A26. Given that the Council argues that the strategic allocation is consistent with para 83: “Greenbelt can develop in exceptional circumstances” it is considered that the same can apply to extending the boundary to include the additional 4.2 hectares.

6.13 The inclusion of this site would ensure “consistency with the Local Plan Strategy in meeting identified requirements (para 85). This also requires that boundaries are “defined clearly using physical features that are permanent and readily recognisable”. The heavily tree lined eastern boundary, and the access road to the west, as well as the allocation to the south ensure that this site can be consistent with para 80 and “would not have to be altered within the local plan period”.

6.14 Para 89 requires any development not to have “greater impact on the openness of the greenbelt”. Given the site allocation to the south and the significant green boundaries to the site, it is unclear how any development within the residential curtilage can be adversely impacting on the openness of the greenbelt, over that already proposed by the large allocation at Blackwell Farm.

7.0 CONCLUSION:

7.1 The opportunity to expand the allocated site at Blackwell Farm will be consistent with the ethos and vision of the Submission Guildford Borough Plan and assist the Council in achieving its objectives without any detriment to the significant constraints in the Borough regarding impact on the open countryside and greenbelt. In line with the NPPF the site can contribute to sustainable development and the three dimensions of social economic and environmental roles. It complies with Para 7 by providing housing supply that meets the needs of present and future generations, within a high quality environment, with accessible local services. Economically it will allow the co-ordinated provision of necessary infrastructure when considered alongside the urban extension allocation A26, and environmentally, it can ensure a strengthened boundary and blend between the Blackwell Farm strategic site and the adjacent green belt, contributing to the protection and enhancement of the natural and built environment.

7.2 The benefits to the inclusion of the site at Wellington House into the Strategic urban extension can be summarised as:

- The opportunity to bring forward a site that is available, deliverable and viable in line with NPPF.
- It is appropriate, and available for development.
- Its inclusion would comply with the overriding ethos of a presumption in favour of sustainable development in line with the NPPF.
- Increased housing provision from approx 100-120 residential units (depending on design and infrastructure requirements), and associated CIL receipts.
- Increased land supply to provide additional residential dwellings in line with the LAA and at an early stage of the local plan.
- To provide additional residential units in a sustainable location that is in close proximity to both proposed and existing local centres and the urban boundary.
- To utilise a site that has already been deemed sustainable in regards to sustainable transport.
- To enhance a site that has already been released as an exceptional circumstance from the greenbelt.
- The opportunity to design the residential layout that can sufficiently blend with adjacent greenbelt and ensure a more successful transition between the new strategic scale development within the urban extension.
- Utilise the natural landscape of the site and its treescape to enhance the A31 frontage and regularise the form and shape of the existing allocation, without detriment to the integrity of the greenbelt.

7.3 It is therefore recommended that the site at Wellington House be included in the strategic allocation under Policy A26, in line with objectives and principles at both National level and local level and, when considered against the
“whole plan approach”, can contribute towards achieving the objectives of a sound local plan, which can guide successful development in Guildford until 2033.

APPENDIX ONE:

Site Boundaries and Site Plan

[IMAGE 1]

APPENDIX TWO:

Regulation 18: Draft Local Plan Strategy and sites. Original site boundary for 106.2 hectares.

http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=17346&p=0

[IMAGE 2]

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

Attached documents:

| Image 2 Suzanne Holloway.png (545 KB) |
| Image 1 (Suzanne Holloway).jpg (172 KB) |

Comment ID: pslp172/1055  Respondent: 10808833 / David Brandon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/3299  Respondent: 10808833 / David Brandon  Agent: Vail Williams (Suzanne Holloway)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )
Vail Williams have been appointed by Mr David Brandon, as landowner to make representations on Guildford Borough Council Regulation 19 Submission Local Plan: strategy and sites (2017).

This representation builds on the preceding representations made in June 2016 to the previous Reg. 19 stage of the proposed Local Plan 2015-2034.

There have been a number of changes and alterations to the proposed plan particularly in terms of decreasing overall housing numbers, by approximately 1,400 dwellings overall to 12,462 from 13,860, in the most recent version of the proposed local plan reg. 19 (June 2017). The plan states in paragraph 4.1.9a that this total annual housing target is lower than what is set out in the LAA 2016 “as having potential to be delivered over the plan period” so that there is flexibility in the plan and it is demonstrable that the “strategy is capable of delivering the target”. However, given the total housing target the Council should be increasing these numbers to ensure that their OAN, along with the unmet need across the Housing Market Area (HMA), are met.

According to a recent HBF response to the Guildford Borough Council Proposed Submission: Strategy and Sites 2017 Consultation “the Plan is unsound as the Council have failed to plan positively in relation to meeting the needs of the neighbouring authorities”. For example, Woking continue to plan using their currently adopted Core Strategy which sets figures at 225 units below the OAN set out in the 2015 West Surrey Strategic Housing Market Assessment. Guildford, similar to Waverley, therefore has a duty to cooperate to aid Woking in meeting their unmet need.

The same issue was also discussed recently at Waverley Borough Council’s Examination in Public (EIP) where the Inspector determined that Waverley, and Guildford, should be increasing their housing targets to accommodate Woking given that they are all in the same HMA.

This representation focuses on Policy A26: Land adjacent to Blackwell Farm, and the full statement attached below seeks to demonstrate that our clients’ site, is deliverable, suitable and achievable for residential development in line with paragraph 47 of the NPPF.

It is considered that the residential property, and its curtilage, provides an opportunity to allocate the site for additional residential development, and would enhance the existing allocation whilst providing a unique opportunity to enhance housing delivery without detriment to the surrounding area.

In addition, the most recent changes to the proposed local plan has seen the overall plan period being decreased to 19 years, from 2013-2033, to 2015-2034; there has been a loss of overall strategic sites with the removal of the Normandy and Flexford site from the plan which was set to deliver some 1,100 new homes across the plan period. These changes in reducing housing numbers, reducing the overall time period of the plan and reducing the number of strategic sites, while the need for housing has not decreased but may, in fact, have increased due to the Borough’s duty to cooperate to help the overall HMA and Woking specifically to help meet their need, illustrate that further sites will need to come forward in order to deliver enough houses to meet the needs of the overall area within the plan period.

Despite the Guildford Borough Topic Paper 2017 on Housing Delivery which sets out the reasons for reducing their housing targets due to the allowance of the NPPF and NPPG for the Borough to lower their targets where adverse impacts of providing housing on constraints such as the AONB, Green Belt and Infrastructure Capacity would “significantly and demonstrably outweigh the benefits” of providing new housing (pg.8-9).

The demand for the additional housing need still exists and can be accommodated in sites such as Wellington House which will, overall, have a less harmful impact on the surrounding area and Borough due to its location adjacent to the Blackwell Farm strategic site, than other stand alone sites which may come forward, as it fits in and creates a stronger defensible boundary between the built up area and the open countryside, does not decrease the open gap between Guildford and Ash/Tongham any more than already proposed, and will not have infrastructural transport issues as these have already been mitigated within the Blackwell Farm proposal.

Within this most recent Regulation 19 plan proposal, further weight appears to be put on defensible boundaries with the Green Belt, seeing multiple sites allocated for development in the plan changing to amend their boundaries to make them more defensible. The inclusion of the Wellington House site into Policy A26 would “square-off” the strategic site and create a more natural boundary to the site which would be a hard line edge between the built up area and the Green Belt.
The site at Wellington House is currently developed as a residential site, being a large house and garden, and therefore constitutes as a Brownfield site on which development would be more suited to than those green field sites that are also being put forward. Therefore, the inclusion of this site would create less of an overall impact on the Borough and surrounding area than an undeveloped Green Belt site.

While it is acknowledged that this site is currently designated as Green Belt and there were large numbers of comments and objections (some 3,313) to the Green Belt policy in the local plan, the removal of this site and inclusion into policy A26, would “square-off” the site and create that defensible boundary which would be more suitable for development in the area than alternative stand-alone sites, as aforementioned.

The proposed transport infrastructure plans outlined in document T13 show that major improvements are to be made to the A31 along the Hogs Back in conjunction with policy A26. Given that Wellington House and Blackwell Farm share an access point, it makes further sense that Wellington House be included in this allocation rather than the additional housing provision be found elsewhere as the necessary infrastructure provisions associated with this type of development have already been planned for and will not need to be provided as they would on a different site.

In summary our representation is as follows:

- The site is owned by a single landowner who has had a consistent approach to putting this site, which, in line with the NPPF, is available, deliverable and viable, forward for consideration since 2014.
- The Landowner has been fully engaged in the process of promoting this site from the beginning.
- The site is fully suitable, appropriate, and available for development immediately or in the future.
- If this site at Wellington House is not allocated for development under Policy A26, it may come to be a vacant and unused site in the future due the impacts such a large strategic site will have on the amenity use of the dwelling.
- There is an increased need to deliver housing numbers for the adjacent LPAs in line with the HMA and the determination by a planning inspector that Waverley take on half of Woking’s unmet need and suggestion that Guildford share the burden of providing some of this remaining need also.
- The number of houses delivered by the Borough is historically poor and Guildford Borough Council need to recognise the need to be flexible and release additional sites which will not create a negative impact on the surrounding environment or Green Belt, such as this Wellington House site.

With this, the benefits to the inclusion of the site at Wellington House into the strategic urban extension of policy A26 can be summarised as:

- The opportunity to bring forward a site that is available, deliverable and viable in line with NPPF.
- It is appropriate, and available for development.
- Its inclusion would comply with the overriding ethos of a presumption in favour of sustainable development in line with the NPPF.
- Increased housing provision from approx. 100-120 residential units (depending on design and infrastructure requirements), and associated CIL receipts.
- Increased land supply to provide additional residential dwellings in line with the LAA and at an early stage of the local plan.
- To provide additional residential units in a sustainable location that is in close proximity to both proposed and existing local centres and the urban boundary.
- To utilise a site that has already been deemed sustainable in regards to sustainable transport.
- To enhance a site that has already been released as an exceptional circumstance from the Green Belt.
- The opportunity to design the residential layout that can sufficiently blend with adjacent Green Belt and ensure a more successful transition between the new strategic scale developments within the urban extension.
- Utilise the natural landscape of the site and its treescape to enhance the A31 frontage and regularise the form and shape of the existing allocation, without detriment to the integrity of the Green Belt.

Based on a new and updated evidence base, it is therefore recommended that the site at Wellington House be included in the strategic allocation under Policy A26, in line with objectives and principles at both National level and local level and, when considered against the “whole plan approach”, can contribute towards achieving the objectives of a sound local plan, which can guide successful development in Guildford until 2034.
Examination

The site is considered to be deliverable, suitable and achievable. As Blackwell Farm can assist the delivery of housing, in a sustainable location, we would like to register our interest in participating at the Examination and attend any pre-examination meetings.

Please see covering statement for additional justification in regard to National and Local plan policies.

[Text continued in next comment]

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

Attached documents:

Comment ID: pslp172/3300  Respondent: 10808833 / David Brandon  Agent: Vail Williams (Suzanne Holloway)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

1 Introduction

1.1. Vail Williams have been appointed as planning agents for Mr David Brandon as landowner of Wellington House, Hogs Back GU3 1DE. This representation is our clients’ response to the Guildford Borough Council Regulation 19 Submission Local Plan, July 2017 which will guide development until 2034.

1.2. This representation builds on previous submissions for the site as part of the submission at the Regulation 18 stage of the Local Plan in September 2014, reference DLPSA/3565, and the 2016 representation to the Regulation 19 stage previously submitted.

1.3. This site relates to a 4.2 hectare residential site to the west of Policy A26 (site 60 as identified in site assessment documents as allocated in Guildford Borough Council Local Plan Submission Plan (GBCLP). For site boundaries of the allocation and the proposed site see Appendix One.

1.4. This representation seeks to demonstrate that our clients’ site, remains deliverable, suitable and achievable for residential development in line with para 47 of the NPPF. It provides Guildford Borough Council with the opportunity to allocate the site for additional residential development, enhancing the existing adjacent allocation at Blackwell Farm, whilst providing a unique opportunity to improve housing delivery without detriment to the surrounding area.

2 Site Context and Opportunity

2.1. There is a large U-shaped 2 storey residential property, an access road, and a large residential garden within this site, along with significant mature treescape which bounds the site and forms a natural boundary with the Green Belt land to the west. The site has one owner and is available and suitable for residential development.

2.2. This site is adjacent to Blackwell Farm, the strategic housing allocation (policy A26), which is a 78ha site located approximately 500m from the Guildford town settlement boundary. The A31 lies to the south of the site and acts the main access to the house, along with being the primary access to the Blackwell Farm allocation to the north. There is also a separate 2 storey residential property “The Gardens” which lies immediately to the North of the site.

2.3. This representation seeks to demonstrate that approximately 100-120 additional dwellings could be provided on the land, adjacent to the primary access road at Wellington House, through the use of only the residential house and its garden. In this regard, a small scale alteration to the proposed urban extension would result in only a 5.3% increase in site area. We propose that the opportunity to deliver a more comprehensive development which does not undermine the
context or the character of the surrounding area could be achieved at this site with minimal impact to the surrounding area.

2.4. With a presumption in favour of sustainable development, this representation seeks to demonstrate how the objectives of the national policy framework (NPPF) and proposed local planning policies (GBLP) could be consistent with the inclusion of this site into the strategic extension site of Blackwell Farm under policy A26, and that the Borough Council should amend the Policy A26 boundary.

3 Previous Considerations & Representations in relation to regulation 18

3.1. This site was previously proposed at the 2014 Regulation 18 stage and the 2016 Regulation 19 stage on behalf of the landowner, Mr Brandon, by planning consultants D&M Planning and Vail Williams respectively. Within the Guildford Borough Local Plan Proposal Map 2003 the site is designated as Metropolitan Green Belt and is in an Area of Great Landscape Value (AGLV).

3.2. As outlined in the previous representation, the site was proposed at Regulation 18 stage by the landowner with the potential for residential development, in a sustainable location and adjacent to the strategic development site proposed by Guildford Borough Council. The site was, at that stage, identified as open countryside and abuts the proposed allocation. Despite numerous concerns raised by objectors regarding the impact on protection policies including the AONB and AGLV, including objections from Natural England, the site immediate adjacent to Wellington House was allocated as an extension to the settlement boundary and significant development was justified over and above greenbelt, character, agricultural, and access concerns.

3.3. At the Regulation 18 stage, 13,040 dwellings were identified as required (652 per annum) as set out in the 2014 SHMA. The first representation for Wellington House confirmed that this figure did not reflect the objectively assessed need for housing (OAN) and that the housing figures were therefore considered too low. This then considered alternative scenarios regarding higher growth need, including DCLG figures that proposed a much higher rate of 704 dwellings per annum.

3.4. It is considered that despite this previous representation, and the subsequent 2016 representation, this site at Wellington House has not been adequately assessed or considered as part of the land supply assessments. With this, the proximity to the allocated site and redefined settlement boundary warrants the additional 4.2 hectares, with a clear defensible boundary, to be added to the existing 78 hectare allocation under policy A26.

4 Updated Comments as a result of the evolving Evidence Base and the Regulation 19 Proposed Plan.

4.1. In line with the NPPF, the plan must demonstrate that it is positively prepared, justified, effective, and consistent with national policy. Whilst our previous representations reiterated that it is agreed that these tests relating to the evidence base are sound, there are a number of issues raised in regard to the specific assessment of the land supply available for residential development, given that the site at Wellington House has not been included in the site assessments nor those housing supply figures as now amended, that have been cited in the July 2017 version of the Regulation 19 stage Local Plan.

4.2. Since the Regulation 18 stage in 2014, the site allocated at Blackwell Farm has been reduced to 1,500 homes being delivered within the plan period, from approximately 2,000 homes. With this, the site has been reduced from 106.2 to 78 ha through the loss of land west of the access road. For original Regulation 18 map, see Appendix Two.

4.3. The July 2017 update of the Local Plan shows that Policy S2 relating to housing supply, now identifies a decreased figure of 12,426 new homes over the plan period (a level of 654 per annum, which has been reduced from 693 per annum, according to the 2017 SHMA addendum). Historically, the delivery of housing has been low for Guildford and whilst the plan identifies phased delivery from 2019/20-2023/4 with an increasing annual housing target, it is considered that based on delivery rates, the most effective method of ensuring housing targets are met is through maximising the allocation and identification of sites.

4.4. The inclusion of Wellington House would ensure that this can be dovetailed with the delivery of key infrastructure, which is central to effective planning, and is identified in the Councils own Infrastructure Delivery Plan (June 2016).
4.5. Based on the Land Availability Assessment 2016 (LAA) and the study on the 2015 West Surrey Strategic Housing Market Assessment (SHMA), the requirement for housing based on demographic led projections meant that 517 dwellings would be needed per annum (Table 76 - SHMA). The fully considered OAN of 693 homes per annum equated to a total of 10,985 new dwellings over the period of the plan. This highlighted the significant need for new housing in Guildford and the dominance it has within the wider West Surrey HMA.

4.6. Since this, a 2017 Addendum to the SHMA has been released which indicates that due to economic circumstances the housing need for the Borough should be reduced from the original 693 dwellings per annum to 654 dwellings per annum on the basis that the new housing target has been reduced to what has been deemed a suitable figure for the Borough when standing alone, apart from the rest of the West Surrey HMA.

4.7. Given the issues of delivery, as a member of the HBF, we have seen sight of their representations responding to this proposed submission, which also states that the housing requirement reductions are unjustified and would cause the plan to become unsound. They also note that this 2017 SHMA addendum has been commissioned by Guildford Borough Council only and solely looking at their needs, without taking into account the wider needs of the West Surrey HMA. Vail Williams LLP are therefore concerned that the plan does not reflect an adequate duty to cooperate.

4.8. The Land Availability Assessment Addendum (June 2017) shows that the Blackwell Farm site is due for delivery years 4-15 for 1500 homes within the plan period, with highest delivery per annum being 170 new dwellings per annum across years 11-15. The housing trajectory also identifies a deficit in development up until the year 2025 (p8).

4.9. However, whilst the original and amended SHLAAs, SHMAs and Local Plans seem to identify adequate land supply over the plan period, this is only for Guildford itself with the housing trajectory figures having been decreased overall to provide flexibility for the Council within their LAA allocations. This does not take into account the need for the wider area, particularly Woking’s unmet need. However, the historic delivery rates, and need to plan positively and flexibly to consider all opportunities for development, in line with para 47 of the NPPF, requires the council to consider and assess all sites. These should be available, achievable (with realistic prospect that housing will be delivered on the site within 5 years) and be viable.

4.10. On this basis, it is argued that Wellington House should be included as part of the site allocated in Policy A26, on the following grounds:

**Achievable and Deliverable:**

4.11. The proposed site remains in single ownership, who has proactively proposed the site at both Regulation 18 and, the prior, 19 stages of the local plan process demonstrating positive engagement and consideration of the relevant policy in order to show that this site is both achievable and deliverable.

**Suitable:**

4.12. While the Green Belt constraints remain across this site, it has been removed for the immediately adjacent Blackwell Farm site on the scale and opportunity of its development warrants exceptional circumstances.

4.13. Therefore the additional 4.2 hectare Wellington House site could increase this opportunity for much needed development. With this, the site already abuts the primary access road for the Blackwell Farm, and therefore both the existing mature landscaping and access arrangements are established. Within the LAA 2016, the allocated site at Blackwell Farm (page 428, ref. 311), acknowledges that although the site is in the Green Belt, it partially adjoins the urban area.

4.14. Additionally, the existing mature trees create a sense of enclosure as with the adjacent site proposed at Wellington House. This provides a clear and defensible boundary with mature greenspace which would fit into the Blackwell Farm allocation and would make the defensible boundary stronger. With this, other sites such as Ripley and Burnt Common have had their boundaries amended in this July 2017 Local Plan to ensure they are more defensible in the Green Belt. This is not consistent with Wellington House and Blackwell Farm.

4.15. The partial inclusion of the site in the AGLV is acknowledged, however as the site is in a Low flood risk (Zone1) and as a residential house and garden has no Agricultural land classification, unlike the allocated Blackwell Farm site, the
allocation of Wellington House and its curtilage do not warrant such additional constraints. It is also considered that as PDL land with existing buildings, the land should be considered over and above other loss of green belt sites proposed.

4.16. The Sustainability Appraisal (June 2016) states in Box 6.5 the following:

'Blackwell Farm to the south-west performs relatively well as a sit option when considered in isolation, relative to other strategic site options, as there is the potential to facilitate delivery of new strategic infrastructure (including a rail station) and enable an extension to the Surrey Research Park; and development would mostly avoid the loss of Green Belt identified as most sensitive (red-rated) by the Green Belt and Countryside Study (GBCS; see Figure 6.4). As Such, as urban extension here was identified as a given for the purposes of developing spatial strategy alternatives. With regards to site capacity a figure of 1,800 (i.e. a figure lower than that proposed in 2014, reflecting a reduction in the overall site size to avoid red-rated Green Belt and AONB, and minimise development on Area of Great Landscape Value (AGLV)) was identified as a given, for the purpose of developing spatial strategy alternatives.'

4.17. As discussed in the previous Regulation 19 submission representation, the Sustainability Appraisal acknowledges that the location and principle of residential development in this location, along with the scale of development, are consistent with the principles of sustainable development. Paragraph 6.4 of this appraisal also identifies that the Blackwell Farm site’s Green Belt sensitivity is at a medium scale. Therefore, in regard to the presumption of sustainable development, it is considered appropriate that the same conclusions could be drawn against increasing the Blackwell Farm allocation to include Wellington House.

4.18. While this site is located within the Metropolitan Green Belt and there have been a large array of comments on Policy P2 relating to the Green Belt and its protection, no significant changes are proposed to be made to Policy P2. However, Wellington House’s removal from the Green Belt and inclusion into the policy A26 would further consolidate the defensible boundary of this urban extension and would provide a stronger boundary between the urban area and the Metropolitan Green Belt while providing a suitable site for additional housing supply to meet the overall need for Guildford and the HMA, and not creating additional harm to the character of the area or the infrastructure available.

4.19. As the site is ideally located adjacent to a proposed strategic site and the appropriateness of the development in regards to housing supply and its rich contribution to the provision of new homes, Guildford Borough Council should therefore support the allocation at Blackwell Farm being extended to include Wellington House.

4.20. The Guildford Borough Transport Strategy 2017 (ref. T13) associated with the Regulation 19 proposed Local Plan shows plans to update the A31 at the entrance to the Blackwell Farm strategic site. These plans include a “new signalised junction from Blackwell Farm site to A31 Farnham Road” (ref. LNR3), an “access road at Blackwell Farm site with link to Egerton Road” (ref. LNR4), and “Interventions to address potential highway performance issues resulting from development at Blackwell Farm site” (ref. LNR5), along with significant bus networks being introduced to serve the site (ref. pg.16). These vital upgrades to the infrastructure serving the Blackwell Farm strategic site provide further reason for the Wellington House site to be included, as it will mean that Wellington House will not need significant additional infrastructural upgrades in order to be viable and sustainable. This again should be considered in context with other proposed sites that will need further infrastructure investment.

4.21. The evidence base and the recent addendums to the LAA (ref. T11a), SHMA (ref. T26a) and Transport Strategy (ref. T13) all support that the site is available, suitable and deliverable, and due to the single ownership of the site it should be considered that there is potential for development to be phased in line with policy approach from the larger strategic site, whilst enhancing housing supply within the early stages of the Local Plan.

5 Wider Policy Compliance with Regulation 19

5.1. As iterated in the June 2016 Representations, the Spatial vision of the Local Plan looks to maintain the extent and function of the green belt in such a way to protect the character of the Borough. The vision then continues to explain that as not all of the development needs can be met within the urban areas, that it is proposed to “focus some development on large greenfield sites, which brings with it significant infrastructure, (and) helps to make it sustainable”.

5.2. In the context of Wellington House, the site would have additioanal to this objective, and support the principal of maintaining the Green Belt whilst providing essential infrastructure in a sustainable location. The loss of Green Belt is a
highly contentious issue with some 3,313 comments and objections received last year relating to Policy P2, as
aforementioned. The consolidation of extra, well needed, sites such as Wellington House joining with Blackwell Farm in
Policy A26, would allow the Green Belt to be saved elsewhere and remain as robust as it is intended to be.

5.3. The vision of the proposed Local Plan also confirms that new development on the edges of existing urban areas will
be required to treat the transition from urban to rural character in a sympathetic way, whilst affording great protection to
the AONB and AGLV. It is therefore suggested that Wellington House, through careful and considered design would
ensure that the redevelopment of the additional 4.2 hectares would help to more appropriately address the transition to the
newly defined settlement boundary and will “not compromise the overall character of the Borough”.

5.4. Policy S1 relating to the Presumption in favour of sustainable development, states that the Borough Council will
“work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible”. In
this regard, Wellington House is suitable and achievable, as it fills sustainable design objectives of the plan and aligns
with the presumption in favour of sustainable development given its location in relation to the Blackwell Farm strategic
site and proposed access.

5.5. While paragraph 4.1.4 has added in that “when implementing Policy S1, local circumstances will be taken into
account to respond to different opportunities for achieving sustainable development” which includes the presumption of
sustainable development not automatically applying to policies relating to Local Green Belt, AONB, designated heritage
assets, etc. However, the location of Wellington House in relation to the urban area extension for Blackwell Farm (Policy
A26) should be presumed to be sustainable despite its designations, given that the nature and reasons for sustainability
being applied to Blackwell Farm should also apply to Wellington House. Should Blackwell Farm allocation progress
without Wellington House, then the circumstances and relationship of the existing residential development adjacent to the
new allocation will also be significantly altered.

5.6. Policy S2 confirms the new lower provision of 12,426 new homes from the previous 13,860 homes, but accepts that
“the housing target…is not a ceiling”. The Reasoned Justification for this lower number is stated in the Regulation 19
plan to be “lower than the total supply of homes identified in the Land Availability Assessment [2016] as having
potential to be delivered over the plan period” so that there is flexibility in the plan and so that it is demonstrable that the
Council’s “strategy is capable of delivering the target” (paragraph 4.1.9a of Regulation 19 Plan). However, in doing this,
the OAN for the entirety of the West Surrey HMA along with Woking’s unmet need have not been considered, meaning
the Guildford Borough Council are in fact failing their Duty to Cooperate and therefore making this plan unsound.

5.7. To confirm that the recent HBF representation (July 2017) to the Local Plan, “policy S2 could be considered out of
date from the point at which the plan is adopted” as the 2017 LAA Addendum identifies 881 new dwellings fewer than
required to meet the housing target, including the potential backlog of dwellings between 2019/20 and 2023/24, based on
the trajectory set out in policy S2.

5.8. It has already been argued that Wellington House can ensure that as the site is within one ownership, it can be
brought forward in advance of the strategic site, ensuring a more flexible approach to delivery, whilst ensuring delivery
throughout the plan period can address an early years deficit until 2023 (LAA 2016, p20).

5.9. Policy P1 states that the Surrey Hills AONB is to be conserved and enhanced, whilst proposals in the AGLV will be
required to demonstrate that they would not result in harm.

5.10. It is proposed that careful design and layout, due to the defined boundaries of the site (aligning with the western
boundaries of the adjacent allocation) that the proposed site would not undermine any further the AONB or AGLV but
would merely “square-off” the site and allow the transition to be more consistent with the approach taken in Policy A26.

5.11. Policy P2, which has not changed in the most recent update of the plan, relates to the Green Belt. It is stated in the
NPPF that Green Belt boundaries should only be amended in exceptional circumstances. Given that there is a significant
requirement for housing within the Borough, and that the site is strategic in nature for additional employment and
infrastructure provision, the Council has considered it appropriate to propose the urban extension site at Blackwell Farm.
However, it is maintained that the inclusion of land at Wellington House could also contribute additionally to the housing
provision and, therefore, the same exception should be applied to the Wellington House site.
5.12. The Council states in the proposed plan that they intend to provide a Green Belt SPD which will amplify Policy P2. With this, it is considered that the close relationship with the access to Blackwell Farm, along with the irregular shape of the existing allocation, is justification for the site to be included in the proposed urban extension in Policy A26, and that whilst the site could be a buffer in regard to design and scale due to its blend with the adjacent Green Belt, careful design could easily address this.

5.13. As stated in the June 2016 representations, as Wellington House already has a large residential property within the site, the nature of the site is previously developed and therefore there is a significant difference between the land and its residential curtilage and that of the adjacent open areas that more formally contribute to the Green Belt and its open character.

5.14. Policy P2 also argues that development on a site in terms of replacement buildings, within the green belt, will take the scale and proximity to existing buildings into account. Given the significant scale of the proposals at Blackwell Farm, it is considered that well designed additional residential dwellings on the adjacent site at Wellington House can be justified in relation to the overall visual impact, and that the integrity of the Green Belt would not be undermined by “square-ing off” and infilling the urban extensions allocation in Policy A26. Therefore, this additional land is consistent with the reasoned justification provided by the Council in paragraph 4.3.26 which sets out that infill development “is considered to be the development of a small gap in an otherwise continuous built-up frontage”, “should be appropriate to the scale of the locality”, and should “not have an adverse impact on the character of the countryside or the local environment”.

5.15. The proposed plan appears to put weight on defensible boundaries and appear to have amended the boundaries of some strategic sites in order to be more defensible between the built up area and the surrounding Green Belt land. This can be seen with sites such in Ash (Policy A28), the Former Wisley Airfield (Policy A35), and the Garlick’s Arch, Send/ Burnt Common site (Policy A43) to name a few. These were all amended in order to make the Green Belt boundary more defensible according to the reasons for change within the 2017 Key Summary Changes document.

5.16. Given these amendments, it could also be shown that the boundary of the strategic Blackwell Farm site policy A26 could be amended to include Wellington House and, as aforementioned, “square-off” the allocation which would create a more natural, harder, and more defensible boundary between the site and the Green Belt without causing additional harm to the Green Belt and the character of the area, while increasing the number of suitable, available and achievable sites required to meet the OAN for the entire HMA.

5.17. As stated in the previous representations, Policy D1 of the submission Local Plan relates to design polices and place shaping and the need to create a harmonious integrated mix of uses. The unique opportunity to expand the scale of the urban extension allows the proposals for the new local centre, employment floorspace, SANG and housing to be enhanced, and the ability to enhance further the opportunity for sustainable movement whilst enhancing housing land supply figures can be achieved in an already justified location.

5.18. The inclusion of the Wellington House site would allow any residential development to “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” (Policy D1). Despite part of this policy being deleted since 2016, the site at Wellington House would respond meaningfully and sensitively to the site, its characteristics and constraints, whilst being laid out to make the best use of the natural features of the site. This relates to the opportunity to utilise the topography and natural landscape of the trees and existing mature boundary treatments of the proposed site, which are appropriate to their setting.

5.19. Policy A26 sets out the details of the allocation at Blackwell Farm for 1500 homes, 30,000sqm of employment space,

5.20. Gypsy and Traveller pitches, comparison and convenience retail, community uses, a 2FE primary school, and a new secondary school. This significant development site abuts the wellington house site and the shared access road is illustrated to as a primary vehicular access to serve the development. The allocation as it stands will significantly alter the character and setting of Wellington House and not including the site within the allocation ignores an opportunity to further enhance the objectives of sustainable development.
5.21. With this, there has been an addition of bus schemes (BT6) which will provide “significant bus networks” for Blackwell Farm “to match additional requirements for their site allocation policies” and a requirement for a secondary school which has been moved from the Normandy and Flexford site to Blackwell Farm, both of which could serve Wellington House also, making it an even more sustainable and suitable site to be allocated alongside Blackwell Farm.

5.22. The inclusion of Wellington House under the A26 strategic site allocation, contrary to design, would have a great impact on the overall wider local plan given its suitable, achievable, available and sustainable location which would create a stronger defensible boundary with the Green Belt, provide significant aid in terms of meeting additional housing need, and create minimal additional impact to the overall character of the town and Borough.

Other local plan policies:

5.23. Other key documents which form an integral part of the evidence base to this proposed local plan include the LAA Addendum (2017), the SHMA Addendum (2017) and the Strategic Highways Assessment Report (2017).

5.24. The LAA Addendum 2017 (ref. T11a) outlines that Blackwell Farm was reduced in capacity due to a revised understanding of the site’s potential capacity. This is sited within reasons for many of the LAA site amendments, and overall has decreased the number of proposed houses in the plan period despite their need remaining. This site at Wellington House has the potential to provide additional housing which would help meet the need across the Borough as well as the wider HMA, particularly Woking’s unmet need, which the Waverley EIP inspector has advised Waverley and Guildford share.

5.25. The five year housing land supply as of the 1st April 2017 set out in this document is also stated to be 2.36years. This is not sufficient and does not meet the requirements set out by the NPPF for each Council to demonstrate that they can provide. Further to this, the inclusion of this site would aid in the increasing of this housing land supply figure and meeting the Council’s duty to adhere to national policy.

5.26. The SHMA Addendum 2017 (ref. T26a) seeks to provide an updated assessment of the Objectively Assessed Need (OAN) in the Guildford Borough. The decrease in housing need for the Borough from 693dpa to 654dpa due to changing economic figures, according to the recent HBF representation, should not necessarily mean that the Council should have reduced their housing numbers as employment forecasts are uncertain and consideration needs to be given for hob growth in other areas within the HMA. This addendum takes Guildford into account as a standalone Borough, which in reality, does not produce realistic housing need figures, as the HMA needs to be assessed together as a whole. Wellington House is a site which is ready and available to come forward to take some of the housing numbers outstanding in the plan with as minimal impact to the character of the surrounding Green Belt as possible.

5.27. The Guildford Borough Transport Strategy 2017 (ref. T13) sets out a programme of schemes for transport related infrastructure required and planned in relation to proposed schemes and site allocations throughout the plan period. It is noted that there are significant improvements to be made to the A31 around the Blackwell Farm and Wellington House site entrance. These include new signalised junctions (LRN3), links to Egerton Road (LRN4), interventions to prevent potential highway performance issues resulting from development of the site (LRN5), and significant bus network improvements and additions (BT6). These are all planned improvements to the transport infrastructure associated with the Blackwell Farm site and the inclusion of the Wellington House site allocation would further increase the suitability and achievability of the site as these essential infrastructure improvements are already planned for provision.

5.28. There are no other constraints on this site that would preclude it from development potential. A planned development would be able to address the raft of specific policies in relation to sustainable construction, open space provision, energy efficiency and all other local plan requirements through careful and considered design. The site should therefore be considered to be consistent with the NPPF and Local Plan policies.

6 Justification of including Wellington House, in line with the National Planning Context NPPF

As stated in the previous local plan representations;

6.1. The NPPF (paragraph 14) states:
“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

The inclusion of Wellington House seeks the opportunity to meet development needs, gives flexibility to the housing land supply whilst the benefits outweigh any harm that has already been mitigated through the allocation at Blackwell Farm.

6.2. Paragraph 15 states that “development which is sustainable should be permitted without delay.” The site is available and can be delivered without delay as issues relating to access, suitability and sustainability have been established in principle as part of the adjacent strategic land allocation.

6.3. Paragraph 17 of the NNP requires Local Planning Authorities to empower local people to shape their surroundings whilst allowing Local Plans to be “a creative exercise in finding ways to enhance and improve the places in which people live”. It states that every effort should be made to objectively identify and meet development needs “responding positively to opportunities for growth”.

6.4. It continues, that planning should “take account of the different roles and characters of different areas”. In regards to the Guildford Local Plan, if this has been adequately considered for Site A26, then the approach can be applied to Wellington House to further respect the character of the locality whilst allowing every effort to identify development opportunities.

6.5. The NPPF also encourages the use of previously developed land, whilst actively managing growth to make the fullest use of sustainable transport, and focusing development that can be made sustainable. Paragraph 30 encourages patterns of development that facilitate sustainable modes of transport. Focusing additional growth on the boundaries of the allocation would meet all of the Core Planning Principles of the NNPF, whilst opportunities for sustainable design and construction can be amplified in a larger scale scheme.

6.6. Paragraph 47 of the NPPF requires local authorities to “boost significantly the supply of housing” and that developable sites should be identified. Through the identification of the Blackwell Farm as a key site, critical to the delivery of housing development over the plan period, Guildford Borough Council has accepted the principle of development in this location, and has justified that this overrides the previous green belt allocation. It does not however identify Wellington House as developable.

6.7. The NPPF requires delivery to be realistic whilst Paragraph 50 also requires policies to be flexible over time. It is considered that due to historical levels of under delivery the inclusion of the additional 4.2 hectares will allow a flexible, realistic and achievable site to come forward, that can be self sufficient, or developed as part of the wider strategic allocation.

6.8. Paragraph 52 states that “the supply of housing can sometimes be best achieved through planning for larger scale development, such as new extensions to settlements.” Whilst the authority has illustrated this in Site 26 at Blackwell Farm it has not done this far enough, and the potential to include Wellington House, ensures that the opportunity “provides the best way of achieving sustainable development”.

6.9. Whilst paragraph 53 resists the use of residential gardens, when it is harmful. Given the scale of the curtilage of Wellington House, of 4.2 hectares and the close proximity to the large 78 hectare site at Blackwell Farm, it is consistent that the supply of additional dwelling houses within the residential curtilage would not cause harm, indeed it could be positively planned to ensure a more consistent approach to the setting and context of the wider site.

6.10. Paragraph 55 requires residential development to be innovative in design, raise design standards, significantly enhance its setting and be sensitive to the defining characteristics of the local area. Due to the defensible boundaries of the site, the unusual shape and form of the allocation at Blackwell Farm and the precedent given to the use of the access road leading to both Wellington House and Blackwell Farm, the opportunity to allow the residential house site to be
developed as a buffer to the strategic allocation to the north, can ensure that this is achieved through careful design and layout, respecting the local character and context. This will ensure that the development complies with Paragraph 56 which requires development to establish a strong sense of place, and optimise the potential of the site to accommodate development, responding to local character.

6.11. Four of the five objectives related to greenbelt policy cited in para 80, are to protect the sprawl of built up areas, prevent towns merging, assist in the safeguarding the countryside from encroachment, and preserve historic towns. The principle of the allocation at Blackwell Farm ensures that these have been considered and assessed, against the overriding need for land for housing for period of the Local Plan.

6.12. The extension of the site to include Wellington House can therefore be agreed that the principles of adding an additional 4.2 hectares on a 78 hectare site (5.4% increase) would not undermine the gap between built up areas, nor create the merger of towns. The scale of the site, adjacent to the larger allocation does not result in any additional encroachment eastwards into the countryside, but merely “squares-off” the site, along the already allocated access road that is the primary access to the allocated site, A26. Given that the Council argues that the strategic allocation is consistent with paragraph 83: “Green Belt can be developed in exceptional circumstances” it is considered that the same can apply to extending the boundary to include the additional 4.2 hectares.

6.13. The inclusion of this site would ensure “consistency with the Local Plan Strategy in meeting identified requirements (paragraph 85). This also requires that boundaries are “defined clearly using physical features that are permanent and readily recognisable”. The heavily tree lined eastern boundary, and the access road to the west, along with the allocation to the south, ensure that this site would be consistent with paragraph 80 and “would not have to be altered within the local plan period”.

6.14. Paragraph 89 requires any development not to have “greater impact on the openness of the Green Belt”. Given the site allocation to the south and the significant green boundaries of the site, it is unclear how any development within the residential curtilage of this site could be adversely impacting on the openness of the Green Belt, over that already proposed by the large allocation at Blackwell Farm.

7 Conclusion

7.1. As previously iterated in the preceding representations, the opportunity to expand the allocated site at Blackwell Farm will be consistent with the ethos and vision of the proposed Guildford Borough Local Plan and will assist the Council in achieving its objectives without any detriment to the significant constraints in the Borough regarding impact on the open countryside and Green Belt.

7.2. In line with the NPPF, the site can demonstrate sustainable development along with the three dimensions of social, economic and environmental roles. It complies with Paragraph 7 by providing housing supply that meets the needs of both present and future generations, within a high quality environment, with accessible local services. Economically, the site will allow the coordinated provision of necessary infrastructure when considered alongside the urban extension allocation A26, and environmentally, it can ensure a strengthened boundary and blend between the Blackwell Farm strategic site and the adjacent Green Belt, contributing to the protection and enhancement of the natural and built environment.

1. The site is owned by a single landowner who has had a consistent approach to putting this site, which, in line with the NPPF, is available, deliverable and viable, forward for consideration since 2014.
2. The Landowner has been fully engaged in the process of promoting this site from the beginning.
3. The site is fully suitable, appropriate, and available for development immediately or in the future.
4. If this site at Wellington House is not allocated for development under Policy A26, the site will be significantly impacted, through the adjacent large strategic site and this will have a detrimental impact on the amenity use of the dwelling.
5. There is an increased need to deliver housing numbers for the adjacent LPAs in line with the HMA and the determination by a planning inspector that Waverley take on half of Woking’s unmet need and suggestion that Guildford share the burden of providing some of this remaining need also. This is not met in this current plan.
6. The number of houses delivered by the Borough is historically poor and Guildford Borough Council need to recognise the need to be flexible and release additional sites which will not create a negative impact on the surrounding environment or Green Belt, such as this Wellington House site.

7.3. With this, the benefits to the inclusion of the site at Wellington House into the strategic urban extension of policy A26 can be summarised as:

- The opportunity to bring forward a site that is available, deliverable and viable in line with NPPF.
- It is appropriate, and available for development.
- Its inclusion would comply with the overriding ethos of a presumption in favour of sustainable development in line with the NPPF.
- Increased housing provision from approx. 100-120 residential units (depending on design and infrastructure requirements), and associated CIL receipts.
- Increased land supply to provide additional residential dwellings in line with the LAA and at an early stage of the local plan.
- To provide additional residential units in a sustainable location that is in close proximity to both proposed and existing local centres and the urban boundary.
- To utilise a site that has already been deemed sustainable in regards to sustainable transport.
- To enhance a site that has already been released as an exceptional circumstance from the Green Belt.
- The opportunity to design the residential layout that can sufficiently blend with adjacent Green Belt and ensure a more successful transition between the new strategic scale developments within the urban extension.
- Utilise the natural landscape of the site and its treescape to enhance the A31 frontage and regularise the form and shape of the existing allocation, without detriment to the integrity of the Green Belt.

7.4. Based on a new and updated evidence base, it is therefore recommended that the site at Wellington House be included in the strategic allocation under Policy A26, in line with objectives and principles at both National level and local level and, when considered against the “whole plan approach”, can contribute towards achieving the objectives of a sound local plan, which can guide successful development in Guildford until 2034.

[See attachment for Appendices]

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

Attached documents: Appendices.pdf (952 KB)

Comment ID: pslp172/491  Respondent: 10810881 / William Edwards  Agent:

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

We 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 sites 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
- 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 for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We 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 sites 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
- 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 for Nitrous Oxide.

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

I would like to object strongly to the development of Blackwell Farm and the Hogs Back. I believe building 1,500 houses, a supermarket and shops, 6 travellers' sites, at least one school and to extend the University Research Park onto Blackwell Farm at this end of The Hog's Back, or indeed at any part of the Hogs Back, would overwhelm an already very congested road system.

The University, Cathedral and A3 bypass cannot cope as it is with the amount of traffic and this development is entirely unsustainable environmentally. This part of Guildford already experiences high levels of pollution and congestion and I don’t feel that we can expose our children in Onslow to any more pollution which is inevitable with such a large scale development.

I understand that new houses are needed but does the University really have to extend any further than it already has? As it is the University has built continuously on the Manor Farm and Blackwell Farm area over many many years. Why should this part of Guildford, where is there is barely any green belt still in existence, have to yet again bear the brunt of both the University overdeveloping everything in sight (once the campus was set in a green oasis and Manor Farm was a small green sports area, now all covered in concrete and buildings) or to a massive area of house building to house
employees or students from the University. As the Prime Minister recently said, Enough is Enough. Please consider leaving SOME open space for our children and grandchildren to enjoy.

I understand that legally you have to put your plans out to consultation and equally realise that you never take a blind bit of notice of objections but why not, just for a change, prove that Guildford Borough Council really does listen to their residents? It would be so refreshing.

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

Attached documents:

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Comment ID: pslp172/1612  Respondent: 10822401 / L Ryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: PSLPS16/1996  Respondent: 10824193 / Rupert Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The proposed development of Blackwell Farm some 72 hectares of farmland and ancient woodland although reduced number of homes will still require major infrastructure investment. The area is regarded as farmland and in Green Belt. The Surrey Sports Park has expanded greatly in recent years encroaching on open spaces result of which is a dramatic increase in traffic on limited highways although the junction has had a major improvement the roads leading from Guildford and Park Barn have not increased in size or flow to meet volume of use.

Surrey University received permission for student accommodation in 2004, this has not been developed, there are also other areas within the Campus areas which could provide student accommodation such as the large open air car parks used during the day and empty evenings weekends and out of term times. The University could develop these areas on a similar to the recent planning application made by Guildford Borough Council for the open air car park and bus depot. There would be with the unused planning sufficient accommodation to house the vast majority of students which should release local housing to rent and reduce the calculated demand not to mention cut in CO2 emissions, road traffic as majority of students would be living on campus. Council Tax should also be charged an additional revenue stream to help develop the Borough amenities and road improvements.

I can see why Surrey University are not keen to explore this option as it would involve them providing commercial finance for the infrastructure, design, planning and development. Whereas by selling Blackwell Farm to developers the University would benefit from a substantial investment.

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

We object to GBC changes to the draft local plan and inclusion of Blackwell Farm as a development site (Policy A26 & Para 4.1.9) as stated in the postcard which came through our door from save hogs back, which:

Disregards an independent expert landscape study which demonstrates that part of the site merits AONB 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.
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 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:**

<table>
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<tr>
<th>Comment ID: pslp172/1431</th>
<th>Respondent: 10830881 / Lisa Carter</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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We 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
- 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]
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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: pslp172/728</th>
<th>Respondent: 10833409 / Penny Hewitson</th>
<th>Agent:</th>
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<tr>
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We 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]
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

I write to say yet again how greatly I object to the above Policy which in my view will [illegible word] the whole part of the Hog’s Back, take even more Green Belt land (which was always supposed to be protected throughout the country) reduce further the production of crops on excellent farmland, caused even more traffic congestion and air pollution.

In September 2014 when This project was first suggested, I wrote (and reiterate my comment then) to say The University is surrounded with plenty of land which could provide extensive student accommodation. I see from the report in the Surrey Advertiser of 30/6/17 I was not alone in This suggestion. Also there is other land not yet used, so again use that already available.

As to the Research Park, I suggested they and the do as in other areas – build up or below ground. There is so much space allocated for car parking which could be put to better use if the cars were able to use a carpark underground leaving extensive space to build at least two storey facilities covering the same area.

Regarding the 1800 not affordable housing plan – are these really necessary? Usually the constraint refrain is for affordable housing. If you get approval for this plan and use more of Blackwell Farm how long will it be before another Plan is suggested and the whole farm will be completely concreted over plus where will other “sites” be earmarked for
housing and offices/car parking. Nowhere will be safe from proposed “developments” regardless of traffic congestion, air pollution etc.

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

Attached documents:

Comment ID: pslp172/4832  Respondent: 10833441 / I Morgan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/5141  Respondent: 10834593 / Andre Sim  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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<th>Comment ID: pslp172/1795</th>
<th>Respondent: 10836641 / Peter Wilkinson</th>
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- 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]
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<th>Comment ID: pslp172/4835</th>
<th>Respondent: 10839329 / Frank Saxby</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: pslp172/3613</th>
<th>Respondent: 10840193 / Nicholas Pickford</th>
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Directs more office space to an extended business park (policy E4) which will increase peak time congestion and encourage rat-running through residential areas which is already a major problem.

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 exceeds safe EU limits for Nitrous Oxide.

Disregards an independent landscape study which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review (4.3.8)

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

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We 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:

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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:** pslp172/4033  **Respondent:** 10847521 / Andrew Procter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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 changed policy A26 Blackwell Farm for 1500 homes which is still far too much.

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

1.4 The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

1.5 Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

1.6 The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

1.7 The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital’s A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that...
construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

1.8 The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worpleson and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

1.9 The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat).

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

Attached documents:

Comment ID: PSLPS16/310  Respondent: 10848385 / Judith Coslette  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I wish to object to the proposal in the Local Plan to build a significant development at Blackwell Farm on the Hogs Back.

Despite the proposed additions to infrastructure, I feel this would simply be adding to the existing problem of too many people needing to travel into Guildford or along the A3 from that area. The road system cannot cope with the current level of traffic, let alone with an additional 4,000 homes, some of which will no doubt have 2 cars rather than one.

We have seen from previous developments that many people won’t use public transport even if more buses or trains are available – they prefer the convenience and greater reliability of driving. They are even less likely to walk or cycle – as anyone who has been passing a primary school at about 3.30pm will tell you.

The beautiful view of the Hogs Back from the A31 is one of the most attractive routes into Guildford and appreciated by visitors and regular commuters alike. Sadly this will be lost if there is a massive new development of housing, offices, a school and various other buildings. This does not fit well with our policy of protecting Guildford’s character as a Surrey Hills market town surrounded by countryside and of promoting tourism.

Such a scale of building on countryside will also inevitably have a detrimental impact on wildlife. Once destroyed the natural environment cannot be recovered.

The loss of the fields and paths of Blackwell Farm will also reduce the green space available for dog walkers, ramblers and other people enjoying the outdoors. The government are constantly promoting exercise and interaction with nature as being good for our health, but to support that we need to maintain access to suitable places to walk rather than build on them.

There were so many objections to this proposal at the initial stage and I am disappointed to see that it remains in the Local Plan despite widespread concerns.

I would also like to object to the plan to build 100 homes next to the cathedral on Alresford Road. This is currently an important wildlife corridor with a wide stretch of established hedge and open land, packed with birds and other native wildlife. If this becomes pavement, flats and parking as proposed, wildlife will inevitably be affected.
Alresford Road and Ridgemount also form a well-used safe walking route from the university and Onslow Village into town, which avoids the busy main road with all its traffic fumes. We want to encourage people to walk into town where possible rather than drive, and changing this route into another busy road by adding 100 additional homes will deter people from doing this. Currently it is quiet enough and safe enough for people to walk in the road, avoiding the narrow pot-holed pavement, but this will not be possible with a huge increase in traffic.

Having the cathedral positioned in the middle of a housing estate is also not great for tourism. It is attractively set amongst green fields at the moment, making it a popular venue for all sorts of activities.

I appreciate that the council is under pressure from the government to squeeze a huge number of extra homes into the borough, and the Planning team have my sympathy with their difficult task, but we residents are relying on you to protect our town from over-development and to prevent the loss of important areas of green space. If we continue to build more and more, Guildford will expand further and further until it loses its character and becomes a sprawling metropolis.

I hope you will reconsider the plans.

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

Attached documents:

Comment ID: pslp172/4813  Respondent: 10848385 / Judith Coslette  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/752  Respondent: 10849793 / Anne Brown  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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:

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

Attached documents:

Comment ID: PSLPS16/4113  Respondent: 10853377 / L.A Cort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: pslp172/267  Respondent: 10853377 / L.A Cort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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We 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 sites 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
- 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 for Nitrous Oxide.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1907  Respondent: 10854401 / Roger Newth  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

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

Attached documents:

Comment ID: pslp172/698  Respondent: 10854401 / Roger Newth  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5064  Respondent: 10855361 / Muriel Brock  Agent:
We 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:

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:
The changes to the policy are presented as a reduction in the development proposed. In reality, the changes are only a postponement into the next plan period and the same amount of Green Belt has been taken for development.

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

Attached documents:

Comment ID: PSLPS16/8261  Respondent: 10858977 / Angela Otterson  Agent:

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

I object to policy A26 Blackwell Farm

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of...
protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

**Attached documents:**
I object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

1. The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
2. Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
3. The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
4. Blackwell Farm is very effective in fulfilling the functions of Green Belt.
5. Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
6. More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
7. The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
8. Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in “Guildford urban area” and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

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

Attached documents:
POLICY A26 BLACKWELL FARM

I object to policy A26 Blackwell Farm

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We 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 sites 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
- 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 for Nitrous Oxide.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2385  Respondent: 10860065 / Jenna Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I would like to officially log that I object to Policy A26 and the inclusion of Blackwell Farm and surrounding green belt land as a development site [Policy A26 & para. 4.1.9]

1) 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]. This has been ignored by the council and the local plan.

2) 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. This additional office space is not required and will add additional unnecessary burden on local housing needs.

3) 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]. Traffic is already a major problem in Guilford and this development will make travel down the A3 and Hogs Back and surrounding areas unbearable.

4) 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?

Attached documents:

Comment ID: pslp172/482  Respondent: 10861249 / I Buchan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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]
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• 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 for Nitrous Oxide.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPS16/6621  Respondent: 10861377 / Michael Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We do not have the Transport infrastructure to accommodate 1800 extra houses on the Blackwell Farm site. At peak times the area around the University/Hospital/A3 is totally congested and the A31 is often gridlocked for miles towards Farnham. As people try to access other routes towards this area, the main road through Wood Street Village can get totally congested. I strongly object to the development at Blackwell Farm taking place.

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

Comment ID: pslp172/4896  Respondent: 10861569 / Christine Read  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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- 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 for Nitrous Oxide.

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

Comment ID: pslp172/2002  Respondent: 10861633 / Rosemary Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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

Attached documents:

Comment ID: pslp172/1272  Respondent: 10864737 / Margaret Caressi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/5096  Respondent: 10865089 / D Shotter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/4058  Respondent: 10873025 / John Tucker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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 strongly object to Guildford Borough Council’s draft Local Plan proposal to build 1800 houses, an industrial park and a highway on the slopes of the Hogs Back at Blackwell Farm.

I have lived in Wood Street Village all my life, from 1945, and have chosen to stay here, as have my three married children and their families, because it IS a true village - in the sense that it is separated from the suburbs of Guildford by beautiful common land and therefore retains its own identity. Building at Blackwell farm and surrounding areas will only create a ‘joining up’ of the present gap.

The Hogs Back ridge is known for its wonderful views of surrounding countryside and is a designated Area of Outstanding Beauty - this would be destroyed along with many acres of scenic farmland and ancient woodland.

I remember when Blackwell Farm WAS a farm in the true sense, owned by Mr Brock and wish that it had never been sold to the University, who seem to have a complete disregard for anything other than their own needs.

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

Attached documents:

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Comment ID: pslp172/91 Respondent: 10876545 / Richard Grimmond Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID:  PSLPS16/7831  Respondent:  10876897 / Norman and Morag Evans  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

The University of Surrey - I OBJECT

Every university has a basic duty to provide as much accommodation for its students as possible. Surrey University already has planning permission for a thousand or more housing units for student accommodation and has other land in its campus which could be used to house its students. If the University implemented its permission and built further accommodation, it would release thousands of housing units in the town for ordinary residents. Its proposal for building on Blackwell Farm is opportunistic and profit-seeking, destroying Green Belt land on Hog’s Back, a well-known scenic attraction. A recent independent survey has concluded that the Blackwell Farm site should be included in the AONB: I agree.

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

Attached documents:

---

Comment ID:  PSLPS16/2115  Respondent:  10877601 / Geoffrey Cole  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution
We 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:

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

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- 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 for Nitrous Oxide.

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

Attached documents:

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27. I object to proposed development of 1,800 houses at Blackwell Farm

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:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp172/2058</th>
<th>Respondent:</th>
<th>10892641 / S.J. Havell</th>
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- disregards an independent expert landscape study, which demonstrates that part of the sites 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  
- 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]  
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<th>Respondent:</th>
<th>10896321 / Christine Dunstan</th>
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- Destroy views from the Hog’s Back ridge0 a nationally designated Area of Outstanding Natural Beauty  
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt  
- Increase tailbacks on the A31 and traffic congestion  
- Result in rat-running through local roads  
- Add to Guildford’s pollution

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

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/1745</th>
<th>Respondent:</th>
<th>10901089 / Wendy M. Bew</th>
<th>Agent:</th>
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We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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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:** pslp172/3858  **Respondent:** 10911201 / Claire Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I still object to the proposals for site A26 Blackwell Farm as a whole despite the small reduction in house numbers. This site should never be developed. It is an integral part of the beauty and special landscape around the Hogs Back. There has already been too much encroachment onto this area, and any further development should take place within the parts already built up. There is plenty of scope for the University to make greater use of the land already occupied eg building above and below car parks etc. The land is actively farmed and is also extremely well used by local families and individuals for walking, running, cycling, horse riding, bird watching, observing flora and fauna, etc, and elimination of this lovely open space will send more people to the Thames Basin Special Protection Area. The infrastructure changes that would be required for a development of this scale, in particular the roads and junctions, would add further destruction to the AONB, AGLV and Green Belt. I also specifically object to the new proposal for a huge secondary school on this site. The evidence collected and submitted last summer showed that that there is absolutely no need for an additional secondary school in the area. The neighbouring secondary schools are currently under-subscribed.

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

Attached documents:

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**Comment ID:** PSLPS16/6688  **Respondent:** 10912513 / Sarah Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to proposed development of 1,800 houses at Blackwell Farm.

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

Attached documents:

Comment ID: PSLPS16/7205  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to proposed development of 1,800 houses at Blackwell Farm.

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

Attached documents:

Comment ID: pslp17/335  Respondent: 10913729 / Elizabeth Richings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

Directs more office space to an extended business park (Policy E4), which will increase peak time congestion, particularly around the hospital and A&E which would only add to the current serious congestion of traffic in the area of the A3 and A31 and will affect existing residential areas. Currently in the morning peak traffic period there is severe congestion. This hospital is a Major Incident hospital and fast access must be maintained at all times.

I object to Blackwell Farm being included in this Plan as a development site (Policy A26 & Paragraph 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)

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 (2.1.4a)

In 2015 the National Farmers' Union expressed alarm that our ability to produce our own food and be self-sufficient had dripped from 80% in 1980 to 62%. This will drop to 53% by 2040. As world population grows there is no way that we should be building on good quality farm land. Especially commercial property. A recipe for disaster. Again you must listen to us.

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

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution.

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

Attached documents:

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- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- Add to Guildford’s pollution

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

Attached documents:

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Comment ID: PSLPS16/845  Respondent: 10923393 / Diana Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

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Comment ID: pslp172/746  Respondent: 10923393 / Diana Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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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: PSLPS16/2525  Respondent: 10928385 / Ken Miller  Agent:

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

• destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
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• increase tailbacks on the A31 and traffic congestion
• result in rat-running through local roads
• add to Guildford's pollution.

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

Attached documents:

Comment ID: pslp172/4908  Respondent: 10928833 / MD Marsden  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2055  Respondent: 10932225 / Thomaseen Dunstan  Agent:

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Increase tailbacks on the A31 and traffic congestion
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6663  Respondent: 10941057 / Tim Green  Agent:

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

I object to proposed development of 1,800 houses at Blackwell Farm.

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

Attached documents:
I object to proposed development of 1,800 houses at Blackwell Farm.

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

Attached documents:
I would like to record my strong disapproval for any development of the former Wisley airfield on the scale proposed. There are any number of reasons for this I listed three.

The destruction of the green belt and the devastating effect on local flora and fauna

The negative impact on traffic, the local road system could not support a project of the scale proposed both during the construction phase and when the works were complete.

pollution...noise and light pollution.

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

Attached documents:

---

We object to the proposal to build 1,800 houses, and industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm. This will:

- Destroy views from the Hog’s Back ridge, a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of farmland and ancient woodland from the greenbelt
- Threaten protected wildlife such as skylarks, orchids and deer.
- Increase tailback on the A31 which are already a problem
- Further increase traffic in Guildford, which is already in gridlock almost every day of the week, which in turn will cause further problems for emergency vehicles especially in the area around the RSCH.
- Add to Guildford’s air pollution
- Result in rat-running through residential streets, and additional parking in these same streets
- Result in flooding of homes at the bottom of the slopes due to reduced absorption of the land

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

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- Add to Guildford’s air pollution
- Result in rat-running through residential streets, and additional parking in these same streets
- Result in flooding of homes at the bottom of the slopes due to reduced absorption of the land

In addition, the new land evaluation study, carried out by Land Management Services, an established firm of landscape architects, assessed the area using Natural England’s latest AONB criteria and found that nearly the whole of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

The study also recommended that adjoining “semi rural” areas on the western edge of Guildford, which did not meet AONB criteria, should remain undeveloped as they provided an important setting to the AONB.

Why are the results of this study being blatantly ignored?

Please listen to those of us who have lived in Guildford for many years and who love our area; stop the urban sprawl and keep our naturally beautiful countryside.

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

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

I OBJECT to the proposals for Blackwell Farm because they breach the Green Belt, the housing numbers are excessive, damage would be caused to the Surrey Hills AONB and excessive extra traffic would be inflicted on Send.

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

Attached documents:
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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This is far too large a development: the consequences will be damaging to the natural environment and will overcrowd roads, schools, public transport and parking and medical services.

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

Attached documents:

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I am glad to see that this is the area now targeted for the new secondary school as it make much more sense to have the secondary school within the area that it was going to serve when it was part of the development within A46. However, it seems the point I raised last June (in response to the 2016 release of the draft plan) about school capacity within the area are still valid and therefore I still question whether there is the actual need for an additional secondary school.

I have concerns though with the accessibility to the site:

In terms of vehicle accessibility to/from the site, the plan only shows access in the vicinity of the A3/A31 junction but the dialogue talks about the desire for a secondary ingress/egress point through the research park. My concern is that both
the A3/A31 junction and the Research Park/Hospital/Egerton Road are busy already and therefore whether 2 ingress/egress points are enough for the size of development?

In terms of the connection to the proposed Guildford West railway station (A59) there does not seem to be a clear commitment that there will be pedestrian and/or bicycle access to the new railway station from the area of development. I suggest a dedicated pedestrian/bicycle access provision should be made avoiding the roads on the 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: PSLPS16/7977  Respondent: 10958817 / Steve Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object specifically to any building on Blackwell Farm of the surrounding area on the hogs back for the following reasons:

This area is designated as AONB and Green Belt and should not be built on!

• Any development would destroy existing wildlife that occupies and relies on this land – deer, birds, etc.
• The impact on traffic on hogs back which is already at a standstill every day coming into Guildford. The road and infrastructure around Guildford cannot take additional housing near the hogs back, Blackwell farm and University.
• The housing proposed at Blackwell farm area which is owned by the University is not ‘affordable housing’ or housing that would be used by students. There is already buildings in Park Barn and around the hospital area that needs major investment which could also address housing needs whilst regenerating the area.
• We do not need any more office building and expansion of the Research park.
• We should not make any provision for ‘Travellers’ [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]. There are other cheaper more appropriate sites in the country that could be used.

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

Attached documents:

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Comment ID: PSLPS16/7978  Respondent: 10958817 / Steve Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The connection between Guildford Council and the University is unhealthy and should be investigated for corruption/collusion. They were allowed to buy the land near Blackwell farm under condition that the land would not be developed and would remain green belt – this is being ignored. The University have land which is already approved for housing which has not been developed.

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

Attached documents:

Comment ID: pslp172/940  Respondent: 10964449 / Craig Woolliscroft  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I object to Guildford Borough Council’s 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
- 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 exceeds safe EU limits.
- Further residential houses in this area will continue to swell the already overloaded peak time traffic on many major roads in the area.
- Trains to London from Guildford station are already very over-crowded as peak-time, many times you cannot even get onto the train service never mind trying to get a seat. More people living in the area and using these facilities will further compound the problem.
- Public facilities such as schools & leisure centres are currently very busy and over-crowded, significant population rises in the local area will create an overwhelming burden on their resources & facilities.

I cannot emphasise enough the traffic problem that already exists around Guildford in general, many locals have to spend hours stuck in this traffic whilst they attempt to go about their daily lives.
In my opinion, there should be no further significant increase in housing in the area until all roads are upgraded to cope with the existing levels of traffic and then a sound-plan put in place and delivered in order to cope with the expected increase in traffic. This must be Prior-To building any significant further housing, not agreed to on a promise with a developer and then not delivered.

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

Attached documents:

Comment ID: PSLPS16/5665  Respondent: 10965473 / Stephen Swain  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed additional housing outlined in the Local Plan for the following reasons:

- The area along the bottom of the Hogs Back behind the University land is Green Belt land of considerable quality and should not be built on. If this development goes ahead it is likely to set a precedent for more development in the future, almost certainly resulting in an urban sprawl from Guildford to Ash and eventually to Aldershot. A whole swathe of high quality countryside, with all the associated wildlife habitats, will then be lost forever with a detrimental impact on all the communities in the area.
- The current infrastructure of the area is totally inadequate to cope with potential increase of upwards of 1000+ vehicle movements a day on an already overloaded road, bus and rail system. The A3 is regularly congested at peak times, as is the Aldershot and Worplesdon Roads. A major new road network will be necessary to connect such a development into the existing road system with the resultant loss of more valuable land.
- Any identified housing requirements in the Guildford area should located on existing brownfield sites in the first instance, where connectivity to local services is already in place. Only once such sites have been utilised should any additional land around the town be considered. To my knowledge there has never been any serious consultation with the local population to explain and try to justify why the area suddenly requires nearly 700 houses, and if there is a requirement why they should be provided in one vast estate.
- A development of this size will require a new water and sewerage system to cope with all the properties, as the local system will not be able to cope, again requiring additional land for these facilities.

To summarise, this proposed development appears to have no justification, is in the wrong place, would ruin the local countryside, and have a negative impact on all the communities of the area.

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: PSLPS16/4808  Respondent: 10986241 / Michael Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I am writing to register my strong objection to the plans to develop the above site. This will add to the traffic chaos which already exists and destroy areas of Green Belt and AONB. This project has been driven by the University of Surrey who should be made to carry out the already existing planning they have been granted to provide student and staff accommodation, thus relieving the housing situation in the town. There is absolutely no reason why they should be allowed to pursue these plans which is clearly for monetary gain and will cause irreparable damage and destruction to the beautiful landscape of this area.

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

Attached documents:

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Comment ID: PSLPS16/530  Respondent: 10986529 / Karen Rhodes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy A26 Blackwell Farm I object because huge sprawl of houses will ruin the view from the Hogs Back, a famous view.

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

**Attached documents:**

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**Comment ID:** pslp172/486  **Respondent:** 10996033 / David Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**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:** pslp172/5167  **Respondent:** 10996065 / William May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Please catalogue my objection to devleoping this area of green belt, outstanding national beauty and area of great landscape value.

I feel that this would be a wholy inappropriate development within the green belt. Primarily because it would it be visable from and adjoin protected AONB and area of great landscape value. As soon as that happens the AONB is blighted. The character of the area, totally rural and picturesque, would be significantly harmed.

The local infrastructure could also not cope with it, despite the Highways Agencys plans to improve the A3 and A31 junction. There is so much traffic along that stretch of the A31 and A3 that when just one thing is altered tremendous tail backs are created. For example this week the Surrey Sports Park diverted traffic slightly, and the queue to get to the hospital, research park, A3 and Park Barn was queued back nearly into town. It also took half an hour to leave Park Barn. This side of Guildford is already unable to cope with the volume of cars on the roads and could not cope with any more.
I also object on the grounds how it will negatively affect the flora, fauna and habitat within the local woodland, common land and farmland. For example there are nesting Skylarks each year in the land proposed to be developed, as well as many other species of animals and flora.

There has also not been a significant study in to how this will affect the areas of Park Barn where there has already been some localised flooding over the years. Currently the fields act as a run off for the Hogs Back, and where these to be developed there is concern about the risk of flooding among residents.

The harm to the local area far outweighs any special circumstances that the local council may deem fit and I urge the planners to reject plans at this site, despite the five year plan for house building.

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

Attached documents:

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Comment ID: PSLPS16/8207  Respondent: 10997281 / Judy Bridgeman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- add to Guildford's pollution

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

Attached documents:

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Comment ID: pslp172/94  Respondent: 10997281 / Judy Bridgeman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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- adds to air pollution in neighbouring areas, which already exceed 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: PSLPS16/176  Respondent: 11012161 / Wendy Gathercole  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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- add to Guildford's pollution.

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

Attached documents:

Comment ID: pslp172/2122  Respondent: 11013153 / Peter Carter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I am writing to object to the proposed Guildford Local Plan. This follows my prior letters – which do not appear to have been adequately addressed.

The points below are of general applicability to the plan AND I also specifically reiterate them in relation to the proposed development of the Blackwell Farm area [a26 and 4.1.9]:

1. The development does not address the needs of Guildford, it is excessively heavy and will largely be targeted at encouraging new residents to move to Guildford rather than addressing the housing needs of existing residents
2. The infrastructure within Guildford will not be able to cope [2.14a]:
3. The plan will materially increase the population, rail access to London and the A3 already cannot cope and will be subject to significant further increases in stress as a consequence
4. The Blackwell Farm site will increase traffic at an existing pinch point near the hospital, an unworkable situation AND potentially life threatening if it slows emergency access. I understand the existing traffic levels in this area are already in excess of requirements by local planning inspectors, a matter which will significantly worsen
5. The proposed additional rail stations do not address the major constraint on rail – access to London and indeed the development will make this worse by encouraging Guildford Town Centre station as a hub.
6. The plan does not make adequate provision for already over-burdened schools, doctors and the hospital to cope with the additional population.

7. The consequence of the above is that the town will see increased pollution, both in the town centre, as population increases generally, and specifically around the hospital and Blackwell Farm from a combination of increased traffic on the A3, access to the Hospitals, university, sports park and business park. This may well reduce health around Guildford and will likely reduce the health benefits young people see associated with use of the sports park – which directly neighbours both the farm site and the A3. It will also have knock on implications for Compton, which will see traffic and pollution both from traffic on the A3 and from vehicles using it as a shortcut [a26 key considerations 7].

8. The area around Blackwell Farm and across to Compton on the south side of the downs provides much needed greenbelt, and has significant natural resources / wildlife. The development would irreparably damage the greenbelt around Guildford generally and specifically remove this rare and treasured resource from Blackwell Farm. Additionally it does not specifically set out the rationale / costs and benefits of alternative options for development [P1 para 4.3.8 and S2 para 4.1.9].

Many thanks – for the avoidance of doubt I find it ridiculous that I am being asked to comment for the third time on what is at its core the same plan – I would be surprised if the Council’s decision to continually reissue a relatively unamended plan were not subject to judicial review given it is clearly a tactic to wear down individual respondents.

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

Attached documents:
My feelings are the same for the proposed development at Blackwell Farm on the Hogs Back. Losing this rural landscape will be totally devastating to Guildford.

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

Attached documents:

Comment ID: PSLPS16/4685  Respondent: 11029377 / Peter Turner  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have lived on the Hog's Back since 1936 in three different properties. My father used to farm Blackwell Farm and other local farms. I strongly object to the proposals for the development of Blackwell Farm, the construction of houses and the attendant creation of major road junctions, widening of the bridge over the A3, alterations to the alignment of the A31. Not only will all this create complete traffic chaos in the area but will also destroy an existing area of Green Belt and AONB.

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

Attached documents:

Comment ID: pslp172/5029  Respondent: 11029473 / Mairi O'Connell  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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: pslp172/2013  Respondent: 11031809 / Jackie Scott  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Attached documents:

I have objected to the scheme throughout the planning process.

1. I do not agree that the plan proposed actually meets the needs of the population needing housing and without sight of the study upon which the Council believe they need to do this it is difficult to make specific comment. The failure by the Council to release the report is a grave act against democracy.

2. Building a lot of houses with gardens is the most extravagant use of valuable land. There should be greater consideration to using land already in use to create viable accommodation and work by the use of apartments for single and double occupancy of which there is very little in the area. These facilitate the young getting on to the housing ladder and the old opening up the market of family properties.

3. The area is already over capacity with road congestion causing regular grid lock and pressure on schools and health care is at a premium level. Encouraging more people to the area is not practical.

4. Using valuable and viable farming land for houses is quite ridiculous. The Council should be looking to see how to assist the environment by reducing food miles and therefore keeping good farming land for the purpose it is intended for. This becomes more apparent following the EU Referendum result as it seems likely that even more of our food will now be brought in from the American and African countries thus increasing food miles and pollution.

5. We have seen in recent years the effect of war and how Great Britain had to struggle to survive. Every inch of land that could be cultivated was cultivated otherwise the nation would have starved. We are now living in very volatile times, war is not quite the ridiculous idea it may have once seemed and to give up food growing land to tarmac and bricks and mortar is short sighted.

6. Guildford is already at risk of flooding. Where will the water go with even more building around the town. The loss of trees to take up water, the loss of land to absorb water means the heavy rainfall we now experience is more likely to create flash floods.

5. I object to pushing farmers out of work and losing employment opportunities for those wishing to work on the land.
6. If the objections are not taken on board and the scheme goes ahead then the Council need to scrutinise to the utmost degree of detail the builders financial position. This is an area already severely hit by the EU Referendum and to start a scheme that the builder cannot then complete due to lack of finance would make the Council look very silly indeed.

I hope that the Council will reconsider all schemes for building more houses in this area and stand up to those in central government making such demands of the South East.

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<th>Respondent: 11034881 / Amy Carter</th>
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<tr>
<td>I am writing to object to Guildford Borough Council’s changes to the draft Local Plan and in particular to object to the inclusion of Blackwell Farm (site/policy A26 para 4.1.9).</td>
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</tr>
<tr>
<td>I do not believe that Blackwell Farm is a suitable site for all the reasons that I have listed in detail on the previous two consultations (!) but in reference to the latest document in particular…</td>
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</tr>
<tr>
<td>1. I do not believe that the result of the EU referendum, and resultant reduction in likely population increases, has been taken into account when projecting housing ‘need’.</td>
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<tr>
<td>2. The inclusion of Blackwell Farm disregards independent expert advice on the landscape value of the area as a potential Area of Outstanding Natural Beauty (p1 para 4.3.8) and builds on a very significant amount of the valued Green Belt. It ignores government policy on protection of these areas (NPPF, para 115+116) and fails to include cost and scope of development elsewhere (s2, para 4.1.9).</td>
<td></td>
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<tr>
<td>3. I live in Onslow Village and we already suffer on a daily basis from the area being used as a rat-run for vehicles trying to avoid the traffic on the A3 and A31 with severe issues on the A3 in particular a very regular problem. If this development goes ahead, this will inevitably worsen and other villages such as Compton and Puttenham will be drawn in too. Congestion in our area is already awful during peak times – this too will worsen, particularly as the intended development includes yet more office space close to an existing busy business park (E4 (2)). Indeed, expert traffic studies, which the council has access to, question the viability of the development at all (2.14a). Access to the Royal Surrey A and E is already very challenging and an increase in traffic will put lives at risk.</td>
<td></td>
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</tr>
<tr>
<td>4. Pollution is also a big issue – the levels in our area already consistently exceed safe EU limits on pollution – the building work, the finished housing development and the resultant traffic increases will all further worsen pollution locally, affecting our health and that of the other families in our areas and neighbouring areas and villages (A26 key considerations (7)).</td>
<td></td>
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<tr>
<td>Please reconsider the use of Blackwell Farm on this scale – it is not appropriate and will have a hugely negative impact on our town and countryside.</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>
<td></td>
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<td><strong>Attached documents:</strong></td>
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</tbody>
</table>

| Comment ID: pslp172/5113 | Respondent: 11035873 / Alison Johnson | Agent: |
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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I OBJECT to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

Attached documents:

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- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

Attached documents:
I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - "checking the unrestricted sprawl of large built-up areas". There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 "assists in safeguarding the countryside from encroachment" - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - "assists in urban regeneration by encouraging the recycling of derelict and other urban land". Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, "The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB". I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worpleston and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact
resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

Attached documents:

Comment ID: pslp172/1173  Respondent: 11036289 / Osman Abdullah  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/3048  Respondent: 11036833 / C R Dobson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Policy A26 and paragraph 4.1.9
I object to Guildford Borough Council's changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site which:

• disregards an independent landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review
• 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 which will also
further limit reliable access by public transport
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and questions the viability of the development (2.14a)
• does not appear to address the concerns expressed by Surrey County Council, Environment and Infrastructure Directorate (letter 18 July 2016 to GBC page 9) regarding an appropriate access strategy for the site and the movement of traffic and non-car modes
• adds to air pollution in neighbouring areas, which already exceed 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: PSLPS16/3841  Respondent: 11041121 / Catherine Dean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy A26, Blackwells Farm, Hogs Back:

I object to the proposals in Policy A26, Blackwells Farm, Hogs Back, Guildford. The area is of high landscape and environmental value and lies entirely within the Metropolitan Green Belt. This site lies on the edge of the Surrey Hills Area of Outstanding Natural Beauty (AONB), indeed the parcel of land includes part of the AONB as well as part of an Area of Great Landscape Value and an area of Ancient Woodland.

The roads in this locality cannot support the traffic from an additional 1800 homes, plus the commercial, retail and community uses proposed in the policy. The addition of so much traffic associated with this development will in no way “provide relief to the A31/A3 junction, in advance of delivery of the Highways England A3 scheme”. It is not known what the Highways England scheme might be, whether there is indeed a scheme at all, and when any such scheme might be delivered. Meanwhile, the existing roads will be overwhelmed by yet more traffic.

The area is on part of the Hogs Back Ridge, topographically higher than the Cathedral. The road junctions at the very least would require night time street lighting as the traffic densities are already high, and this would destroy the rural aspect of the locality. The whole site forms the panoramic vista from the top of the Hogs Back – a historical and geological feature which contributes to Guildford’s special character. This, too, is recognised in the Landscape Character Assessment, which describes the Hogs Back as the ‘iconic spine to the borough’

I wish to add this further objection to my response of Thursday 14th July 2016 to the Local Plan.

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

Attached documents:

Comment ID: pslp172/697  Respondent: 11047585 / Mark & Julia Way  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID:  PSLPS16/4103  Respondent:  11067329 / Mike Barden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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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:  pslp172/485  Respondent:  11067329 / Mike Barden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: PSLPS16/4102  Respondent: 11067393 / Gillian Barden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- add to Guildford's pollution.

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

Attached documents:

Comment ID: pslp172/472  Respondent: 11067393 / Gillian Barden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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:

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Attached documents:

Comment ID: PSLPS16/6748  Respondent: 11080097 / David & Julia Hunt  Agent:
I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - "checking the unrestricted sprawl of large built-up areas". There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. 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Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. 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All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worpleston and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact.
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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: pslp172/794  Respondent: 11080097 / David & Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: pslp172/5114  Respondent: 11080257 / D J Ellis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7184  Respondent: 11100193 / Michael Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by
Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4860</th>
<th>Respondent: 11101505 / Daphne White</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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We 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 sites 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
- 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 for Nitrous Oxide.

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<tr>
<th>Comment ID: pslp172/4869</th>
<th>Respondent: 11146433 / Alexia Cowen</th>
<th>Agent:</th>
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
Policy A26 outlines extensive development and expansion but does not provide an adequate increase in infrastructure to support it.

Also, this area is currently used for recreational purposes by SRP employees and nearby residents - the allocation does not specifically include recreational space (e.g. parks) to replace the land that is being allocated for development.

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

Regarding policy A26, you have added a secondary school to the allocation, yet I do not believe there is sufficient access to make this sensible.

You have now stated that Gill Avenue is to be a primary access route - this road is already heavily congested due poor access management by the hospital (vehicles for the front and rear of the hospital entering and exiting via different roads instead of one main road).

You have also stated that the link road from the A31 will be access controlled. Assuming people attending the secondary school will not just be living in this area (you have stated this in allocation (9)), how are they supposed to get in? Again you are assuming that all traffic will enter via the already congested Gill Avenue. I can see the link road being of benefit to SRP (I work there by the way) but not to anyone else. There is still no provision for a road joining Aldershot Road to this area without going through Park Barn and Broad Street - you only state "Developer to provide the western route". This should be set out in the plan and not subject to a developer making a mess of it later.

I would also have expected the Park Barn railway station (A59) to have been placed within the A26 area, and to include park & ride via the railway. Buses get stuck in traffic as well and therefore are not suitable for P&R unless the roads are significantly improved.

I am at least glad that you've added a point about pedestrian and cycle access. I expect the access to the north-west of SRP (via the footpath and tunnel under the railway) to be maintained during any work in this area as it is now frequently used.

Further regarding A59, direct pedestrian access to SRP should be added as a requirement (i.e. don't assume access via RSCH). It should also be stated that pedestrian access from SRP / RSCH to Park Barn should be mandatory and available at all times (i.e. not restricted by being "station property" and "not a public right of way").

Attached documents:
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Attached documents:

Comment ID: PSLPS16/4469  Respondent: 11190945 / Arjen Naafs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Re: Strong Objection to Blackwell Farm development A26

Dear Sir, Madam,

Beechcroft Drive is located close to the proposed development on Blackwell Farm and we have an intimate knowledge of the proposed area and its surroundings. As a Residents Association, we have come to the conclusion that we strongly object the development, based in summary on the following points:

- The traffic associated with 1800 houses simply cannot be supported by the local road network and will lead to:
  1. Larger congestion around the Royal Surrey County Hospital - ultimately threatening accessibility for emergency
  2. Traffic trying to avoid cathedral roundabout will be diverting to Onslow Village and Park Barn- thus affecting safety, pollution levels, and liveability for residents in a much larger
  3. Further gridlocking of A31, A3 and Farnham Road on daily basis, leading to reduced accessibility of Guildford from the South and West as a whole, with all economic and social Adapting local roads, the A31, A3 and cathedral roundabout to cope with this traffic will be extremely expensive and arguably make the A26 (Blackwell Farm) development financially unviable. This is supported by the Technical Note by the Traffic Consultant RGP as presented by Compton PC.

- Furthermore, infrastructure should be improved prior to any construction; this includes enhancing hospital capacity – which is not planned at the moment - and secondary school Both are known to be under pressure at the moment.
- The Blackwell Farm area is very visible from the Hog’s Back and as such will destroy the views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Removing greenbelt and AONB has detrimental impact on setting of the town, availability for future generations and removal of valuable farming land - which is very scarce already in the South-East, seems inappropriate.
- The ancient woodlands (last remainder of Medieval royal deer park of Henry

1. II) play an essential part in the local eco-system of the larger Hog’s Back area. The railway line and building to the North, and the proposed large scale developments in the West, would mean that migration to and from this
essential habitat is limited to the The proposed road from the Blackwell Farm to the A31 effectively completes the isolation and cuts natural migration patterns to the woodlands completely. From ecological point, this removes (one of) the largest forests west of Guildford from the greenbelt and places it within the urban area (Figure 1):

- We further support the Guildford Residents Association in its observation (Report Neil McDonald) that the housing needs as per the local plan are overestimated, and as such development plans are over designed (even excluding consequences of Brexit)
- The Blackwell Farm site includes 6 Travellers pitches, which we believe should be sited in more sustainable locations (not within greenbelt). In addition, counting them towards the developer’s quota of affordable housing is a ludicrous method to try to fulfil the obligation of providing affordable We therefore object to them, as well as the rest of the large-scale development being included within site A26.

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

Attached documents: ![LJP (113 KB)]
Policy A26 – OBJECT: UNSOUND – Not Positively Prepared, Justified, Effective or Consistent with National Policy:

The Council’s proposed allocation of land at Blackwell Farm, Hogs Back, Guildford cannot be considered as a sound land release for the following primary reasons:

- Development Scale and Sustainability: The Council is suggesting that this proposal as a site allocation will create a sustainable development however including 1,800 dwellings. Although the site is within the vicinity of the city of Guildford it is both physically and visually isolated from the urban area and firmly within the Green Belt.
- The scale of development proposed will dominate this located created a clear and harmful extension of the settlement divorced from the main urban area.
- The site will have little or no relationship with the existing urban area and its relative isolation results in an inherently unsustainable form and scale of development.
- Delivery of Essential Infrastructure: The Council identifies in the policy that ‘interventions will be required to address potential highway performance issues’. Furthermore the Council identifies additional infrastructure that will be required for the scheme to be viable and sustainable.
- Appendix C of the Plan sets out the key infrastructure required to deliver the Plan as a whole and in specific relation to Blackwell Farm confirms the following requirements:

<table>
<thead>
<tr>
<th>Infrastructure Required</th>
<th>Cost to Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>New rail station at Guildford West (Park Barn) (NR2)</td>
<td>£10m developer funded with proportionate contribution from Blackwell Farm scheme</td>
</tr>
</tbody>
</table>
| Improvement works to the local road network (LRN3, LRN4 and, LRN5) | LRN3 - £5m  
LRN4 - £20m  
LRN5 - £5m |
| Upgrades to electricity supply network | Development to fund (not yet costed) |
| Upgrades to Foul Sewer network | Developer to fund (not yet costed) |
| Flood risk and compensation works | Developer to fund (not yet costed) |
| Provision of bespoke SANG | Developer to fund (not yet costed) |
| Open Space including playing fields | Developer to fund (not yet costed) |
| A new 2FE primary school with pre-school provision | Developer to provide serviced land and build costs at estimate of £8m |
| Community meeting hall | Developer to fund (not yet costed) |

- Even taking into account those items where the Council has attributed a cost it is apparent that a development of some 1,800 dwellings cannot afford to deliver all of the infrastructure that the Council state is required to make it acceptable in planning terms as a sustainable development. The fact that the Council has not been able to quantify the majority of the works that are required also represents a failing in terms of demonstrating that the Plan will be effective in the delivery of those obligations.
- It is therefore hard to see how a scheme for 1,800 dwellings can come forward with the weight of such a heavy burden of Planning Obligations to enable its delivery.
- Impact on Green Belt: The Green Belt study undertaken to inform the preparation of the Plan confirms that this site will result in the loss of ‘yellow and red rated’ Green Belt land i.e. land that is of the medium to highest value in terms of the contribution that it makes to the objectives of the Green Belt.
• The justification for the release of such high quality Green Belt land set out in the SA (Page 27 of the main SA
document refers) is that the proposal will deliver new facilities, a railway station and an extension to the Surrey
Research Park. This does not amount to an appropriate justification for the release of land from the Green Belt,
particularly where other more suitable locations exist that have not even been tested by the Council through its
Green Belt study.

• Additionally and as set out above the level of new facilities that the Council require from the scheme is likely
to render the development unviable and therefore the benefits identified as the sole justification for the release
of the site will not be delivered.

• The Council’s position in promoting this site as a land allocation is therefore, in Bewley Homes’ view,
completely untenable.

• The Council’s proposed allocation should therefore be deleted and further land allocated to make up the
shortfall in supply.

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

Attached documents:

Comment ID: PSLPS16/7778  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

As set out above, the National Trust is an important landowner within the Surrey Hills AONB and as an organisation we
nationally support the ongoing protection and enhancement of the Country’s protected landscapes be they National Parks
or AONBs.

We are therefore concerned about the proposed site allocation at Blackwell Farm which we understand was
recommended in a recent Landscape Character Assessment to be included within the AONB in Natural England’s Surrey
Hills AONB Boundary Review.

The site allocation will effectively extend the built of area of Guildford, highly visible from the A31 and new access road,
having an impact on the setting of the AONB. We believe this allocation should be removed from the draft Local Plan
until such time as the Natural England Boundary Review process has been concluded.

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

Attached documents:

Comment ID: PSLPS16/1994  Respondent: 14175713 / Maggie Slattery Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

Attached documents:

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Comment ID: pslp172/45  Respondent: 14175713 / Maggie Slattery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: PSLPS16/4040  Respondent: 14186465 / Aidan Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.
- A31 is too dangerous and un-managed
- Fix the infrastructure!
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I wish to object to Guildford Borough Council’s changes to the draft local plan and the continued inclusion of Blackwell Farm as a development site (Policy A26 & para 4.1.9) in the draft local plan.

Policy A26 offers the opportunity for developers to make profit through delivering new houses but does not require them to sufficiently fund and/or develop and/or maintain the necessary and sufficient infrastructure that would be needed to properly connect the Blackwell farm development with the rest of Guildford and ensure its success. Without such an infrastructure requirement and funding from the housing developers, current local residents of Onslow Village and Compton will be severely impacted, both during the build/development phase and afterwards once the new houses are occupied. The current infrastructure is already inadequate for the current residents and users on the western side of Guildford – adding 1,800 more homes will have a severe impact; developers should not be allowed to benefit at all at the expense of the current community on to which the Blackwell Farm estate will join.

I object to the planned access from the A31 to Blackwell Farm for a number of reasons, and not least because it is situated in an AONB, including the following:

- It is neither funded nor planned in sufficient detail to prevent even more congestion on the A31 and the A31 Down’s Lane Junction which is now severely dangerous during morning and evening rush hour
- the A31 into Guildford from the proposed junction is not capable of handling an increase in heavy lorries, nor is the city centre gyratory For this to be one of only 2 access points, the A31 from the City Centre should be upgraded, or current traffic re-routed off it
- LRN3 (Signalized junction on A31) as defined in Guildford Borough’s 2016 Transport Strategy does not have confirmed funding and is not planned for delivery until Policy A26 has not specified the junction to be complete before the housing development starts which will create a massive impact for current commuters and road users on the A31 as developer lorries and vehicles seek access to the site for the next 10 years. Without a controlled junction, it will be dangerous to access from the west bound carriageway of the A31 and cause even more traffic congestion and pollution than is currently experienced
- LRN3 should not be installed until the A3 development programme has a clear plan and funding, including how any interchange between the A3 and A31 will There is a major lack of both detail and contingency planning on this in the Guildford Borough 2016 Transport Strategy; there is only the un-funded and un-defined A3 widening (SRN2) scheme and the aspirational A3 tunnel (SRN10) scheme and nothing in between.

The creation of homes alone will not help the current or future community in this part of Guildford:

- The retail and community allocations described in Policy A26 are miniscule compared to the need of the planned residents, who will want access to better transport, shopping and community facilities (cinemas, restaurants etc) e. all those facilities located in the centre of Guildford
- 1,800 homes will add an additional 2,000 cars1* to already congested and under-funded roads
• The Council’s suggestion that the new residents of Blackwell farm will not have need to travel outside the area is misguided and ill-informed
• Hence the need to thoroughly define and fund sustainable roads and transport infrastructure in advance of any housing strategy to develop the land

No detail is present in the draft local plan and policy A26 into the way today’s communities will exist in the future, nor are there requirements in Policy A26 to deliver infrastructure that will be suitable for future living. The addition of an “opportunities” paragraph in the latest version of the policy A26 are not requirements and will therefore not be delivered by any developer or involved party:

• where are the specific requirements for cycle lanes and cycle paths to help people commute locally in safety, without having to compete with traffic on the over-congested roads?: the A31 from the top of the Hogs Back into Guildford is a “death-trap” for The current defined “cycle way” from the Mount to the Hogs Back is a potholed, dirt track which is un-navigable to all normal road and hybrid bikes during winter
• where are the specific requirements to maintain footpaths for pedestrians to walk into Guildford? The current footpath on the A31 is too narrow, in bad disrepair and too dangerous for pedestrians to use to walk from High View Road into the City Centre
• the growth in internet shopping and home deliveries This creates more need for better roads and access for online suppliers/delivery firms as well as better/faster online access
• where is the requirement and commitment/investment to install super-fast broadband (100Mbps+)? The western side of Onslow village stretching up the A31 to Compton currently only gets 1Mbps connection, which frequently fails during peak The OpenReach projects to install superfast broadband for 450 current homes2* are all underfunded and behind their planned project delivery timescales

The draft local plan and the various other Council strategy documents and policies governing road-use and transportation in and around Guildford are not joined-up. This is a problem throughout the whole governance/government of the areas development.

• The key strategic road is the A3 (and with it trouble-free access in/out of Guildford), although suggested improvements are neither planned nor funded; they are merely wish-list items, and Highways Agency are Without a properly functioning multi-lane highway connecting Guildford to the rest of the South East and UK, Guildford’s inner roads will become more congested than they currently are now, increasing journey times and polluting the environment. The current access on and off the A3 at the western side of Guildford is inadequate and very dangerous in places. Adding more houses will just compound the problem
• The plan to improve traffic flows through Guildford city centre is not yet agreed or Without such plans, the traffic on the A31 will become more congested than current and the pollution levels will not be brought below the necessary standards

Policy A26 is not sufficiently funded and not adequately specified to prevent profit taking by land-owners and builders at the expense of the local community and Guildford Council itself. A strategy to build 1,800 homes on a single plot next to Guildford where all infrastructure is already under severe pressure will not work unless all interested parties have their goals aligned.

If such large housing developments are needed – and that is debatable - then I strongly suggest that it is a requirement that no profit should be allowed to be created/distributed from Policy A26 until the impact of the new homes has been experienced and the necessary investment in infrastructure to at least maintain, and ideally improve the whole of the area is secured and delivered. This should be about developing an expanding community for current and future residents, not just about building houses to meet some statistical need.

2 Cabinet 95 and 97 are not fibre enabled; despite the project to fibre enable Guildford area commencing in 2011. Source: https://www.telecom-tariffs.co.uk/codelook.htm?xid=545597&cabinets=12269

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  - LRN3 (Signalized junction on A31) as defined in Guildford Borough's 2016 Transport Strategy does not have confirmed funding and is not planned for delivery until 2027. Policy A26 has not specified the junction to be complete before the housing development starts which will create a massive impact for current commuters and road users on the A31 as developer lorries and vehicles seek access to the site for the next 10 years. Without a controlled junction, it will be dangerous to access from the west bound carriageway of the A31 and cause even more traffic congestion and pollution than is currently experienced
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The draft local plan and the various other Council strategy documents and policies governing road-use and transportation in and around Guildford are not joined-up. This is a problem throughout the whole governance/government of the areas development.

• The key strategic road is the A3 (and with it trouble-free access in/out of Guildford), although suggested improvements are neither planned nor funded; they are merely wish-list items, and Highways Agency are responsible. Without a properly functioning multi-lane highway connecting Guildford to the rest of the South East and UK, Guildford's inner roads will become more congested than they currently are now, increasing journey times and polluting the environment. The current access on and off the A3 at the western side of Guildford is inadequate and very dangerous in places. Adding more houses will just compound the problem.
• The plan to improve traffic flows through Guildford city centre is not yet agreed or funded. Without such plans, the traffic on the A31 will become more congested than current and the pollution levels will not be brought below the necessary standards

Policy A26 is not sufficiently funded and not adequately specified to prevent profit taking by land-owners and builders at the expense of the local community and Guildford Council itself. A strategy to build 1,800 homes on a single plot next to Guildford where all infrastructure is already under severe pressure will not work unless all interested parties have their goals aligned.

If such large housing developments are needed - and that is debatable - then I strongly suggest that it is a requirement that no profit should be allowed to be created/distributed from Policy A26 until the impact of the new homes has been experienced and the necessary investment in infrastructure to at least maintain, and ideally improve the whole of the area is secured and delivered. This should be about developing an expanding community for current and future residents, not just about building houses to meet some statistical need.

Footnotes
2 Cabinet 95 and 97 are not fibre enabled; despite the project to fibre enable
2 Cabinet 95 and 97 are not fibre enabled; despite the project to fibre enable Guildford area commencing in 2011. Source: https://www.telecomtariffs.co.uk/codelook.htm?xid=545597&cabinets=12269

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

Attached documents:

Comment ID: PSLPS16/3960  Respondent: 15062817 / Keith Liddell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

• destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
• remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• increase tailbacks on the A31 and traffic congestion
• result in rat-running through local roads
• add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/2212  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

39  POLICY A26 BLACKWELL FARM

39.1  I object to policy A26 Blackwell Farm

39.2  There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

39.3  Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

39.3.1  Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.
39.3.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

39.3.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

39.4 Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

39.5 Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

39.6 The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

39.7 The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

39.8 GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

39.9 The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill...
Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

39.10 The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

39.11 The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

Attached documents:

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**Comment ID:** pslp172/2233  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**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 changed policy A26 Blackwell Farm for 1500 homes which is still far too much.

1.2 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.3 Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly.

1.4 The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

1.5 Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

1.6 The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the
Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

1.7 The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

1.8 The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns.

1.9 The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4275</th>
<th>Respondent: 15115201 / Katherine Mutton</th>
<th>Agent:</th>
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</thead>
</table>
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | | IOBJECT | to the development at Blackwell Farm. This will cause a huge increase in traffic. It is already impossible to get along the A3 in rush hour and with the Cathedral, University and Hospital very close all requiring access this is just mad.

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: pslp172/5135</th>
<th>Respondent: 15115457 / Janice Kinge</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: PSLPS16/193  Respondent: 15137313 / Susan Harrington  Agent:

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

I object to Guildford Borough Council's draft local plan to build 1800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will destroy views from the Hog's Back ridge, remove 72 hectares of scenic farmland and additional ancient woodland from the green belt, increase tailbacks on the A31 and traffic congestion, result in rat-running through local roads and add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/237  Respondent: 15143105 / Chelsea Adamson  Agent:

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

I have received you highway to hell flyer and I object to this.

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

Attached documents:

Comment ID: PSLPS16/274  Respondent: 15148673 / David Martin  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail back son the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

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<th>Comment ID: PSLPS16/286</th>
<th>Respondent: 15148993 / Jo Westland Rose</th>
<th>Agent:</th>
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- result in rat-running through local roads  
- add to Guildford's pollution.

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

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<th>Comment ID: PSLPS16/293</th>
<th>Respondent: 15149473 / D Rose</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: PSLPS16/294</th>
<th>Respondent: 15150465 / L Williams</th>
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- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/306  Respondent: 15153665 / Michael Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
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- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/2074  Respondent: 15153665 / Michael Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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- Add to Guildford’s pollution

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

Attached documents:

Comment ID: PSLPS16/311  Respondent: 15153921 / Janet Leila Humphries  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/314  Respondent: 15154145 / B Punter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1761   Respondent: 15154145 / B Punter   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- Add to Guildford’s pollution.

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

Attached documents:

Comment ID: PSLPS16/1763   Respondent: 15154401 / Joan Grist   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- Result in rat running through local roads
- Add to Guildford’s pollution.

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

Attached documents:

Comment ID: PSLPS16/325   Respondent: 15154785 / Robert Edward Fry   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/360 Respondent: 15157473 / Margaret Dodson Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to the council's proposals to build 1800 houses, an industrial park and a highway on the slopes of the hog's back at Blackwell farm. The proposals will:

1. destroy the views from the hog's back ridge - a nationally designated area of outstanding beauty
1. Remove 72 hectares of scenic farmland and additional woodland from the green belt
1. Increase traffic and congestion
1. It amounts to over development and it is not needed

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

Attached documents:

Comment ID: pslp172/190 Respondent: 15163297 / Barbara Collins Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/383</th>
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<th>Respondent: 15198529 / Bernice Leach</th>
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Section page number
Page 387 of 941

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<th>Respondent: 15199617 / Andrew &amp; Carol Herzig</th>
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As a lifelong bird enthusiast and nature lover, member of the RSPB and member of the Guildford Group of the RSPB since 2001, the aspects of moving to Guildford that have brought me the most pleasure are the proximity to areas of natural beauty and the abundance of wildlife.

On regular walks across the fields around Blackwell Farm earmarked for development in Site A26 we have watched large flocks of migrating redwing and fieldfare, heard owls, cuckoos, and skylarks in abundance, and often glimpsed linnets, yellowhammers and families of deer, disappearing in and out of the cornfield. In summer, the incessant skylark song accompanied by glimpses of deer amongst the golden corn and rape fields is truly spectacular -- and at times we have also been amazed at the abundance of butterflies.

As skylarks and yellowhammers are both on the endangered (red list) species, and places for them to breed safely are becoming increasingly rare, to rob the wildlife of yet another zone of perfect habitat, as well as outstanding natural beauty, seems at the very least short-sighted and lacking in environmental wisdom. The proposed use would have a devastating impact on the Area of Outstanding Natural Beauty (AONB) from an aesthetic and environmental perspective. There are a number of endangered (red list) species which inhabit the Hogs Back including skylarks, little owls, yellow hammers and curlews.

Having recently (2012) conducted a survey for the BTO to assess the current population of nightingales breeding in the area around Broadstreet/Backside Common and bordering the proposed development site, it was immensely disappointing to find that where for many years they had been sighted and heard, nightingales were not in evidence that summer. To remove a further section of the vital wildlife corridor linking Whitmoor Common SPA, SSSI, Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside commons (SNCI) to the Hogs Back AONB, would only exacerbate the increasing problem of urbanisation destroying habitats vital to retaining the diversity of species in our area.

It was encouraging however on a late evening walk last night (17 July 2016) to hear spectacularly beautiful and haunting song from a song thrush, in a thicket immediately adjoining the development site. We have recorded it, should it be of interest to the panel. Will these increasingly uncommon birds still be wishing to inhabit an area taken over by building contractors, diggers and machinery? Once lost from our area, will they then return when so much of their habitat has been destroyed?

I cannot emphasise strongly enough my opposition to this development on environmental and aesthetic grounds. The Hogs Back AONB has taken millenia to be formed, vegetated and inhabited by the current wildlife population. Would this current Borough Council wish to be remembered for destroying a section of this beautiful area and the wide-reaching views that have been so precious to countless generations of Guildfordians and those travelling through our county?

Please will you once again reconsider this development – it cannot be in the best interest of our town and its future inhabitants.

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<td>15199649 / M A Snell</td>
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Attached documents:
Comment ID: PSLPS16/625  Respondent: 15215425 / Mary Bodenham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/627  Respondent: 15215489 / Stephen Tullett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/628  Respondent: 15215553 / Justine Curlis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Comment ID: PSLPS16/634  Respondent: 15216001 / Philip Smethurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Comment ID: PSLPS16/635  Respondent: 15216033 / F Bodenham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/637  Respondent: 15216097 / Joan Brand  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/6419  Respondent: 15225281 / Roger Gamlin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to the large proposed development 1,850 houses at Blackwell Farm (A26)

It will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Ripley & Send.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet the requirement of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities.

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

Attached documents:

Comment ID: PSLPS16/751  Respondent: 15236801 / Carly Corrigall  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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 the site at Blackwell Farm for the building of 1,800 houses, an industrial park, supermarket and travellers' pitches. This is likely to destroy views from the Hog's Back ridge, a designated Area of Outstanding Natural Beauty; remove 72 hectares of scenic farmland and ancient woodland from the green belt; increase tailbacks on the already very busy A31 and traffic congestion on this side of Guildford generally; result in rat-running through local residential roads causing both a nuisance and a danger to local residents as well as adding to pollution of the local area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/777  Respondent: 15239297 / T Fleming  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to proposed development of 1,800 houses at Blackwell Farm

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

Attached documents:

Comment ID: PSLPS16/809  Respondent: 15242305 / Matthew Hawksworth  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge

- a nationally designated Area of Outstanding Natural Beauty

- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion

- result in rat-running through local roads

- add to Guildford's pollution

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<th>Respondent: 15242369 / Roisin Merrals</th>
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Comment ID: PSLPS16/815  Respondent: 15242529 / Henry Workman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/825  Respondent: 15242625 / Duncan Pakman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/826  Respondent: 15243009 / James Henderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/828  Respondent: 15243105 / Liam Cardiff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/830  Respondent: 15243425 / James Anthony Pereira  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Comment ID: PSLPS16/839  Respondent: 15244289 / Philip John Burn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: pslp172/341  Respondent: 15244289 / Philip John Burn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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• adds to air pollution in neighbouring areas, which already exceed 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: PSLPS16/840  Respondent: 15244449 / I Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/854  **Respondent:** 15245057 / Marian Homar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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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:** PSLPS16/855  **Respondent:** 15245217 / Kathryn SHORTMAN  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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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:** PSLPS16/856  **Respondent:** 15245249 / A J Henderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/857  Respondent: 15245345 / T Henderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/2045  Respondent: 15247617 / Michael Curtis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object strongly to the proposals for a massive increase of new houses along the Hogs Back. We have lived in Onslow Village for over 38 years and in that time we have seen an enormous increase in traffic congestion and pollution. This proposed development is going to create a catastrophic effect in the area already blighted with severe traffic congestion. My wife and I have been retired now for the past 10 years and can only assume that our quality of life is going to change for the worse as a result of these proposals.

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

Attached documents:

Comment ID: pslp172/1302  Respondent: 15247617 / Michael Curtis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: PSLPS16/925  Respondent: 15253473 / Amanda Brackley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to the proposed plan to build on Blackwell Farm. Save our green fields and trees for us and the wild life. There is enough traffic clogging up Guildford now.... We live in a beautiful part of the country please dont ruin this precious land.

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

Attached documents:

Comment ID: pslp172/194  Respondent: 15254433 / Peter Gatford  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: PSLPS16/1032  Respondent: 15259201 / Mark Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1033  Respondent: 15259265 / Khim Horton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Comment ID: PSLPS16/1037  Respondent: 15259489 / David Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Attached documents:

Comment ID: PSLPS16/277  Respondent: 15259649 / Christine M. Weddle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1038  Respondent: 15259649 / Christine M. Weddle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/1049  Respondent: 15260417 / Maeve Susan Slowcroft  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/3389  Respondent: 15264065 / Roshan Bailey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to this proposed development. It is in an exceptionally beautiful area of Green Belt land and is entirely inappropriate for development. There has already been significant encroachment by sequential development over the years and there has to come a time when a line is drawn. The remaining ancient woodland appears to be excluded from the proposed development, but this woodland and its important wildlife would inevitably be adversely affected by being enclosed by new and existing development. The traffic issues in the area are already severe, and these should be addressed before consideration is given to increasing the load on the A31 and A3. I know from personal observation and work in collecting evidence for a Rights of Way application, that all the fields included in the proposed site are currently used extensively by walkers (with and without dogs), cyclists and horse riders living in the Wood Street, Onslow Village, Fairlands, Normandy and Wanborough areas, and these fields are therefore a really important part of the amenity of the area. Many of the people I have spoken to also visit the Ranges, part of the Thames Basin Special Protection Area, and they would undoubtedly frequent the latter more if these fields are taken from us. I hope that development on this site will not proceed, but please see my comments above re an addition to the infrastructure requirements under Policy I1 and Appendix C in the event that our objections do not prevail.

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

Attached documents:
I still object to the proposals for site A26 Blackwell Farm as a whole despite the small reduction in house numbers. This site should never be developed. It is an integral part of the beauty and special landscape around the Hogs Back. There has already been too much encroachment onto this area, and any further development should take place within the parts already built up. There is plenty of scope for the University to make greater use of the land already occupied eg building above and below car parks etc. The land is actively farmed and is also extremely well used by local families and individuals for walking, running, cycling, horse riding, bird watching, observing flora and fauna, etc, and elimination of this lovely open space will send more people to the Thames Basin Special Protection Area. The infrastructure changes that would be required for a development of this scale, in particular the roads and junctions, would add further destruction to the AONB, AGLV and Green Belt. I also specifically object to the new proposal for a huge secondary school on this site. The evidence collected and submitted last summer showed that there is absolutely no need for an additional secondary school in the area. The neighbouring secondary schools are currently under-subscribed, King’s College by as much as 57%. The New Guildford University Technical College will open in 2018, and both King’s College and Ash Manor have scope to increase their capacity if they reach 100% of their current capacities. Christ’s College also has space, capacity and willingness to expand its intake, and other schools in Ash and Woking can also offer places to Guildford residents. There are thus many ways of meeting Guildford’s needs without going to the expense of building a new school at all.

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

**Attached documents:**

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We have been receiving flyers from the save the hogs back campaign encouraging us to object to the local plan, but no obvious way of showing our support for the plan. We agree that increasing affordable housing in Guildford is a priority and will benefit the whole community. If necessary, this might mean having to relax the protection of some of the beautiful land around Guildford. Whilst we value, love and enjoy the green areas around Guildford and think that planning has an important role in maintaining this, we understand there is a balance between this and the housing needs of the local population and think the plan strikes the balance well.

We agree with the reduction of the site size threshold and increase in the % of affordable housing required, and strongly agree with the removal of the "subject to viability" clause for developers.

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

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

Please see the attached document for details comments from Residents Association Beechcroft Drive concerning Site 26.

[Text of representation below]

Re: Strong Objection to Blackwell Farm development A26

Dear Sir, Madam,

Beechcroft Drive is located close to the proposed development on Blackwell Farm and we have an intimate knowledge of the proposed area and its surroundings. As a Residents Association, we have come to the conclusion that we strongly object the development, based in summary on the following points:

1) The traffic associated with 1800 houses simply cannot be supported by the local road network and will lead to:
   a. Larger congestion around the Royal Surrey County Hospital - ultimately threatening accessibilty for emergency services.
   b. Traffic trying to avoid cathedral roundabout will be diverting to Onslow Village and Park Barn – thus affecting safety, pollution levels, and liveability for residents in a much larger area.
   c. Further gridlocking of A31, A3 and Farnham Road on daily basis, leading to reduced accessibility of Guildford from the South and West as a whole, with all economic and social implications.
Adapting local roads, the A31, A3 and cathedral roundabout to cope with this traffic will be extremely expensive and arguably make the A26 (Blackwell Farm) development financially unviable. This is supported by the Technical Note by the Traffic Consultant RGP as presented by Compton PC.

2) Furthermore, infrastructure should be improved prior to any construction; this includes enhancing hospital capacity – which is not planned at the moment -and secondary school capacity. Both are known to be under pressure at the moment.

3) The Blackwell Farm area is very visible from the Hog’s Back and as such will destroy the views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty. Removing greenbelt and AONB has detrimental impact on setting of the town, availability for future generations and removal of valuable farming land - which is very scarce already in the South-East, seems inappropriate.

4) The ancient woodlands (last remainder of Medieval royal deer park of Henry II) play an essential part in the local ecosystem of the larger Hog’s Back area. The railway line and building to the North, and the proposed large scale developments in the West, would mean that migration to and from this essential habitat is limited to the South. The proposed road from the Blackwell Farm to the A31 effectively completes the isolation and cuts natural migration patterns to the woodlands completely. From ecological point, this removes (one of) the largest forests west of Guildford from the greenbelt and places it within the urban area (Figure 1):

[See attachment for figure 1]

5) We further support the Guildford Residents Association in its observation (Report Neil McDonald) that the housing needs as per the local plan are overestimated, and as such development plans are over designed (even excluding consequences of Brexit)

6) The Blackwell Farm site includes 6 Travellers pitches, which we believe should be sited in more sustainable locations (not within greenbelt). In addition, counting them towards the developer’s quota of affordable housing is a ludicrous method to try to fulfil the obligation of providing affordable housing. We therefore object to them, as well as the rest of the large-scale development being included within site A26.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As Beechcroft Drive is the nearest residential street to the proposed development on Blackwell Farm and we have an intimate knowledge of the proposed area and its surroundings. As Residents Association we have come to the conclusion to **strongly object** the development, based in summary on the following points:

1) The change of accepting vehicular access and from the site to Egerton Road, preferably via Gill Avenue does not regard the safety and impedes access to the Hospital’s A&E unit and cause increased rat running through Onslow Village and Park Barn.

2) Though much welcomed, the Park Barn train station will not be sufficient to avoid significant traffic increase due to Blackwell farm development. In addition, the planning of Park Barn does not include essential cycling access in its design.

3) An independent traffic study commissioned by Compton Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington would see a **surge in traffic numbers** as Guildford-bound drivers seek out the fastest route and divert along the B3000 and B3100.

4) The added clause in P1 “In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest, is much welcomed. However, holding A26 and the damage to the AONB against that very clause we remain unconvinced that a) exceptional circumstances exist (as growth figures are not extreme and arguably over-estimated) and b) that the construction is in the public interest (taking into account the considerable resistance against this scheme).

**Correction of error in urban boundary – ancient woodlands**

The previous revision included corrections in urban boundaries. However, one error near site A26 was overlooked and we use this consultation to bring it to your attention.

In the proposed plan, the forest comprising of Strawberry Grove and Manor Corpse have been added to Guildford Urban area. We are convinced this is an error or oversight, otherwise we **strongly object**:

- Taking any area out of the green belt and adding into the urban area is strongly contested, and only to take place under exceptional circumstances (see Policy P1). Removing forested area from the Greenbelt and adding into urban area is clearly not justifiable and as such can only be considered an error and need to be corrected
- The possible argument that it is all part of the same Parcel, does not make sense, as urban boundaries are made disregarding the parcel boundaries – see the suggested urban boundary around the much debated road from site A26 to the A31.
- Removing ancient woodlands and including it in the urban area is mistaken on both sides 1) rural area and green belt
is reduced and 2) land is added to the urban area that has no development option now or in the future and as such cannot and should be considered urban.

As such, we strongly recommend you to correct this error to the following outline:

[Image]

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

Attached documents: 2017 07 22 Beechcroft drive residents association objection to SRN6 removal site A26 and correction urban boundary.pdf (366 KB)

Comment ID: PSLPS16/1145  Respondent: 15274561 / Thomas Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

1. I do not believe this section to be legally compliant without consideration of the impact of the A3 widening and all additional infrastructure implied. This plan is essentially incomplete and does not include all the mitigations required in the form of additional roads or their impact. Also
   ◦ The plan does not include any analysis of how the junction with the A31 is to be designed, what that impact of signalising will be in terms of backing traffic up onto the A3.
   ◦ The plan requires that a link road is made between the A31 and Egerton road, which will be essential to relieve load on the A31 junction and provide alternative access to Guildford centre, the hospital and services, but provides no plan for how to do this and no analysis of whether this can be made sufficient to mitigate traffic impacts

2. I do not believe this section to be sound
   ◦ I object to such a large development (1800 homes) encroaching into countryside and destroying rural views from the Hogs Back Area of Outstanding Natural Beauty (AONB). To maintain the character of an AONB it is not sufficient simply to avoid development on the site itself. What makes it an AONB are the uninterrupted views both north and south.
   ◦ I object to this plan for Blackwell Farm being proposed separately to the A3 widening scheme. The viability of the plan depends upon sufficient A3 capacity being delivered and the whole environmental and traffic impact must be considered together. It must be very likely that the A3 widening is not built, or is only built after many years or in a different way to that envisaged. The Guildford Borough Transport Strategy 2016 acknowledges that the topography is very challenging
   ◦ However I also object to the widening of the A3 that is implied and required by the Blackwell Farm development. The noise levels and pollution from the current A3 are already very substantial for residents of Onslow Village. Much of the Arboretum is spoilt by the level of existing noise. The New Local Plan contains no details on how to mitigate the additional noise and pollution caused by widening and is not sound in this respect
   ◦ I object to the plan for adding a signalised junction serving the Blackwell Farm development on the A31. The location of this junction will cause traffic to back up on to the A3 and therefore cause tailbacks all through Guildford southbound, which are already very large. The A31 slip road from the A3 can only be enlarged by rebuilding the bridge over the A3 which is not part of this plan. Therefore the plan does not manage the impact of this junction.
   ◦ The location of the new A31 junction does not appear to allow traffic easily to turn right southbound. There is no coherent plan for this junction
   ◦ I object to the likely impact of the Blackwell Farm development in encouraging rat-running through Onslow Village, which is already highly congested in rush hour due to this practise. The A3
congestion caused is likely to cause people to seek alternative routes to the A31 and that means going through the Village.

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

Attached documents:

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**Comment ID:** PSLPS16/1146  **Respondent:** 15274561 / Thomas Davies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I do not believe this section to be legally compliant as it does not take into account the widening of the A3 which is required to make it viable.

I do not think this part of the plan is sound as

- the impact of the loss of views from the Hog's back is not assessed, in that this damages its character as an AONB
- it will generate additional need for transport capacity that is cannot meet
- it requires a link to be established between the A31 and Egerton Road but does not give any details as to how this can be achieved
- the new A31 junction design will cause traffic to back up to the A3 and traffic to be displaced into Onslow Village. Signalisation will cause significant delays to traffic
- additional traffic generated by 1800 homes will put a major strain on a single point of exit
- location of the junction does not make sense in terms of the local topography for westbound traffic to enter the new development
- no contingency for the A3 widening not being completed is made
- no impact assessment for the A3 widening is included

In general terms:

1. I object to such a large development (1800 homes) encroaching into countryside and destroying rural views from the Hogs Back Area of Outstanding Natural Beauty (AONB). To maintain the character of an AONB it is not sufficient simply to avoid development on the site itself. What makes it an AONB are the uninterrupted views both north and south.
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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: PSLPS16/1156  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel. See annex 4.
- Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in “Guildford urban area” and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

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

Attached documents: Site 26 BWF Annex 4.pdf (456 KB)

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Comment ID: PSLPS16/1247  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )
We object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. See annex 3. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill...
Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a
development that would impede emergency access to an A&E department and a major incident unit. The traffic impact
resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly
assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this
work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More
significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas
of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and
Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a
supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”.
In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing
development and there should be a reasonable prospect that the site is available and could be viably developed at the
point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a
development of this scale and thus the site cannot be “viably developed”. See annex 4

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

Attached documents:  
[Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)]
[Site 26 BWF Annex 4.pdf (456 KB)]

Comment ID: pslp172/2598  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent: Green Balance

Policy A26: Blackwell Farm

1. The Save Hogs Back response to the June 2016 Pre-Submission Consultation (Regulation 19) provided a
comprehensive set of reasons why the Blackwell Farm strategic development allocation was so unacceptable that the
Council should not proceed with it. Apart from the serious environmental damage it would do, we questioned whether it
was practicable. The June 2017 Consultation indicates both the determination of the Council to press ahead with this
extraordinarily inappropriate scheme and also that it is trying to deny the implausibility of the development proceeding, if
at all, without appalling consequences. Modest amendments have been made to various policies in the Plan, but
collectively they demonstrate that after another 12 months of searching the Council has still found no solutions to the
problems we identified.

2. The unresolved problems centre on access and egress. Although pitched as an urban extension to Guildford (in the
Spatial Vision, in Policy A26 and in paragraphs 4.1.8 and 4.6.24), Blackwell Farm has proved impractical to integrate
into the town despite its physical proximity. There are many facets to this, the main ones being:
– the Blackwell Farm development cannot proceed without the capacity of the A3 trunk road being increased to bolster
the strategic route in and out of Guildford, and the possibility of this happening is unknown;
– movement between the development area and Guildford, which is already extremely congested, would be substantially
more impeded by the development;
– alternative means of access to the development area would have both significant practical problems and significant
adverse consequences for the highway network;
– the “Sustainable Movement Corridor” to tackle that congestion is most unlikely to be effective on the scale necessary to
resolve access issues and will fail in its key role of reducing congestion;
– the combined effect of the Blackwell Farm development and the A3 widening through Guildford (itself needed in part
because of Blackwell Farm) would be to raise substantially the Nitrogen Dioxide levels in Compton on the B3000 still
further above legal limits at the most polluted point in the Borough.
In each case the Proposed Submission Local Plan has wholly failed to show that the Blackwell Farm development is
practicable. We examine these in more detail below, after showing that the pressure on the road network in the vicinity of Blackwell Farm will be discernibly greater than forecast only one year ago.

Traffic generation in relation to road capacity

3. Mouchel have pointed out, in advice submitted by Highways England in response to the Proposed Local Plan 2016, that there are significant limitations in the evidence presented in the Strategic Highways Assessment Report (SHAR) accompanying the Proposed Submission Plan in June 2016 which affect Blackwell Farm:

- the traffic generation model used in the Local Plan allows no merge delay at junctions: this is clearly not the case at present and is not claimed by GBC to be the case even after new road infrastructure has been built. As Mouchel point out, the effect of the model is to make the A3 and A31 particularly attractive roads because they are assumed to be readily accessible and to draw traffic towards them, whereas in reality there will be less ready access and greater use of the local road network;
- the model uses average peak period traffic movement figures across the three hour period 07.00-10.00, which will tend to understate movements in the true peak hour (circa 08.00-09.00). That will have a significant impact on congestion during periods when the network is most heavily used and, in the vicinity of Blackwell Farm, overloaded.

4. The SHAR indicated that the total vehicle generation anticipated by the Blackwell Farm development would be 717 vehicles leaving in the weekday average morning peak hour (Table 3.3, zone 576). How these vehicles would get out of Blackwell Farm has still not been properly resolved. Policy 26 includes a Plan showing an access to the development site (indeed the only access to the development site) from the A31 at its junction with the very minor road called Down Place. In June 2016 the Local Plan stated that this would be the “Primary vehicular access to the site allocation”. This would “provide a new route to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital.”

5. The Local Plan 2016 identified that a “Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue”. The word ‘preferably’ is instructive because it indicates that it was unclear in June 2016 how Blackwell Farm would be connected into Guildford. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. On the assumption that a means of direct access would be found, the SHAR identified distribution of Blackwell Farm traffic to the network of 342 trips eastbound towards Guildford and 375 trips southbound to the A31 in the morning weekday peak hour.

6. Figure 4.3 of the SHAR estimates traffic on the principal arms of the local network with Blackwell Farm development in place including the link to the A31. This Figure shows that 1,803 vehicles would attempt to enter the Egerton Road/Gill Avenue crossroads by the Hospital in the peak morning weekday hour (one every two seconds). The 342 eastbound vehicles generated by the Blackwell Farm development would account for 19% of the post-scheme traffic on the junction (23% growth on pre-scheme traffic), neglecting the impact of any rat-running traffic. Users of the road would consider this scale of traffic growth implausible and unacceptable given the high level of congestion there at present. The SHAR confirms that the level of congestion on Egerton Road in the morning peak will be substantially worse than at present and will exceed its capacity with the development and its access roads in place (Scenario 3). Table 4.4 (Row 25) shows that Egerton Road eastbound will have a ratio of flow to capacity (RFC) of 0.92 resulting in a level of service with ‘unstable flow operating at capacity’. Table 4.12 (Row 8) shows that Egerton Road westbound will have a RFC of 1.21 (compared with about 1.04 now) resulting in the worst possible level of service with ‘forced or breakdown of flow’. In other words, it simply won’t work. The figures already smooth the morning peak hour figures over a three hour average, as Mouchel noted, so actual congestion in the peak would be worse than these indicators, even assuming zero rat-running traffic.

7. The network effects described in Figure 4.3 of the SHAR omit potential rat-running in the morning peak hour from the A31 through Blackwell Farm to Egerton Road. Drivers passing through Guildford northbound might try to miss the existing substantial queues on the A3 by leaving the A31 just before its junction with the A3 and taking the new link road which allowed them to join the A3 at the Tesco roundabout. Other drivers eastbound on the A31 aiming for Guildford could try to avoid the existing substantial queues both on the A31 and on the A3, as the new road would give them a new means of entry into Guildford from the west. The pressure for rat-running could be considerable if the link was built. Figure 4.7 in the SHAR shows that even after the A3 has been widened there will still be overcapacity and congestion on the A31 close to the A3 junction (and on the A3 through Guildford): this is likely to encourage significant numbers of drivers to dodge the queues on these roads through the Blackwell Farm development. The issue is reviewed in paragraphs 30-35 below, which show that the constraint on rat-running is most unlikely to be effective.
In the 12 months since the 2016 Proposed Submission Consultation by the Borough Council (working with Surrey County Council as Highways Authority and Highways England responsible for the A3), the prospect of adequate network road access to Blackwell Farm has not only made no progress but deteriorated. There are some indications of this in the alterations in the June 2017 Proposed Submission:

- the proposed link with the A31 has been downgraded from its ‘primary’ status and by default the link with Guildford is now presented as of equal significance (Policy A26 Infrastructure Requirements item 1); there are various reasons for this, explored below, but fundamentally the Council has been unable to find a way of making the link with the A31 work as it wanted;
- a major new secondary school with six form entry must now be provided on the Blackwell Farm site, which was previously sited elsewhere (Policy A26 Allocation item 9): a school of this size (circa 900 students comprising 180 students in each year group for five school years) would generate a very substantial amount of additional traffic, bringing in about 600 students daily from outside Blackwell Farm, much of it attracted from Guildford, but there have been no changes at all to the proposed capacity of the road network to accommodate this, which can only mean still worse congestion on Egerton Road and the surrounding network than inevitable anyway;
- proposals in principle are now included for limiting the road users on the new route linking to the A31 (Policy A26 Infrastructure Requirements item 3), but these are deliberately left vague as the Council has been unable to find a way of achieving this despite trying to do so for the last year;

- the developer of Blackwell Farm (ultimately University of Surrey) must contribute to funding improvements to the local road network necessitated by the scheme, but this must now have “regard to the Sustainable Movement Corridor Supplementary Planning Document”: as this SPD has not yet been published even in draft, the policy change demonstrates a remarkable lack of clarity about the role of the SMC in relation to Blackwell Farm (where it will go, how it will be built, who pays for it and how it links into the wider network) and creates an open-ended commitment which could affect the viability and deliverability of Blackwell Farm;
- the new Policy A59 has given a clearer specification of the need for a new railway station at Park Barn near the northern end of Blackwell Farm, with access from both the north and south sides: the access from the south will generate additional traffic affecting the roads to Blackwell Farm, especially in peak periods, which has been neglected in the calculation of traffic generation and the modelling of its distribution to the road network, again placing additional stress on already massively overloaded roads in peak periods.

These changes are additional to the increased traffic on Egerton Road and the surrounding network arising in any event from development planned or under construction at Manor Park and at the existing Research Park.

Traffic on the A3

9. Guildford Borough Council has adopted conflicting positions regarding its intentions for traffic on the A3 through Guildford.

10. The Council has endorsed a study commissioned in 2014 from Arup **Guildford Town and Approaches Movement Study**, a vision statement on transport in Guildford to 2050. This is the basis for the Sustainable Movement Corridor now promoted through the Local Plan by the Council (see paragraphs 51-53 below). However, the Arup study was clear that the purpose of the A3 should be to concentrate through-Guildford movements on this road, assisted by inhibiting its use for local movements. The study recommended: “Interventions in this strategy that reduce roadspace in the town centre should serve to deter through traffic in the town; they should also reduce short journeys on the A3 within the town (for example, trips from the Surrey Research Park to the town centre via the A3) that will free up capacity for longer distance trips on the A3 trunk road”.

11. The Arup study was clear that there should be no capacity increase on the A3 trunk road through the town: “In the appraisal of interventions undertaken for this study, all potential interventions that increased road capacity, including A3 interventions (widening, northern bypass, tunnel) and additional road links in the town centre, resulted in increased traffic levels in the long term over and above business-as-usual changes (i.e. in 2031 compared to the 2031 Business-As-Usual). Vehicle mileage increased by up to 2% across the borough and highway delay increased by up to 16%, with associated deterioration in air quality, noise impacts, land use impacts and Save Hogs Back & Compton PC 5 by Green Balance severance. These interventions are therefore not included in the strategy as they do not strongly support the multi-faceted headline vision for sustainable mobility in the town of Guildford identified to guide the development of the strategy.”
12. However, this study is increasingly being compromised. Arup’s limitation on using the A3 is wholly at odds with the approach which Guildford BC is taking in practice. The Council has decided that the Blackwell Farm development cannot proceed without substantially increased capacity on the A3. The last sentence of the 2017 Local Plan’s ‘Spatial Vision’ states: “The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford”. This is due to existing major peak hour congestion on the A3 (Local Plan paragraph 2.14a). The June 2016 Strategic Highway Assessment Report concluded that “the results of this assessment indicate that should the [DfT’s] Road Investment Strategy schemes [which include major A3 capacity increases through Guildford] not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe… To avoid this occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended” (page 63, emphasis added). This was confirmed in the 2017 Addendum for the revised Proposed Submission Local Plan (Conclusion, page 2).

13. The Local Plan therefore aspires to a very substantial increase in the capacity of the A3, not least to facilitate car-borne travel to and from the major developments planned at Blackwell Farm (and Gosden Hill Farm). The Spatial Vision states:

“The Department for Transport’s Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange. Early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period.”

Paragraph 4.6.14 specifically explains the intention of Policy ID2 ‘Supporting the DfT’s “Road Investment Strategy”’ as including the identified:

“Scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25):

• A3 Guildford – improving the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements.”

14. In the last twelve months, the likelihood of any of this happening has been slipping away. The Local Plan has now been altered with the deletion from paragraph 4.6.18 of the option of a tunnel under Guildford, so that a road widening scheme is now the most likely option (even if a tunnel remains the Borough Council’s preferred option – see Topic Paper: Transport paragraph 5.101). Exactly what is intended is still hugely unclear: the Infrastructure Schedule for this project in Appendix 3 shows that what is proposed is so vague that it may cost anything between £100m and £250m (project SRN5). Only a brief examination of the A3 through Guildford will in any event show just how difficult, costly and enormously environmentally damaging would be any attempt to add significant extra capacity in each direction to the A3.

15. Also deleted is paragraph 4.6.17 which had stated “Guildford Borough Council and Highways England are in the process of agreeing a Statement of Common Ground which sets out assumptions regarding both the performance and safety outcomes that the RIS schemes can be expected to realise”. This is said to be because an SoCG is likely to be agreed closer to the Examination (Topic Paper: Transport paragraph 5.14), but we would not be surprised if Highways England is unable to make the commitment the Borough Council seeks.

16. Highways England itself is doubtful about how much can be achieved on the A3 and by when. Its response to the Proposed Submission LP on 18 July 2016 stated: “There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period.” A Technical Note supporting that submission, prepared by Mouchel, was more precise:

“It should be noted that the A3 RIS 2 scheme is not a committed scheme and no funding has been allocated at present. The details of the RIS 2 A3 Guildford scheme itself are not yet known and so the modelling and testing of an A3 scheme at this stage is considered premature. As such Highways England’s view is that this scheme cannot be relied upon by Local Plans to form mitigation for the development proposals.”

17. So far as we are aware, this remains the position in July 2017. The response subsequently advised that the inadequate evidence base meant that the Plan was considered unsound.

18. Guildford BC found this response hugely inconvenient and persuaded Highways England to withdraw this statement after a meeting on 1 September 2016. Highways England’s letter on 5 October 2016 doing this stated instead (with our emphasis added):

“You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being
applied. The scheme proposes widening the existing carriageway to provide additional capacity and safety improvements between the A31 Farnham Road and the A3/A320 Stoke Road. The design of such a scheme is complex and needs to consider a number of potential options, a process which takes time to complete. We will continue close working with Guildford Borough Council and Surrey County Council to progress the development of the potential scheme. We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. Therefore we wish to formally withdraw our representation to this policy.”

[continued...]

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

**Attached documents:**

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**Comment ID:** pslp172/2600  **Respondent:** 15275009 / Compton Parish Council (Fiona Curtis)  **Agent:** Green Balance

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

[continued]

19. While Highways England is urging caution, Guildford’s Local Plan continues to make highly questionable assumptions. On timing, Appendix C claims that the A3 capacity increase will be ‘delivered’ between 2023 and 2027. This conflicts with paragraph 4.6.14 of the Plan (above) which expects construction to begin three years earlier. Delivery in 2023-27 is itself barely consistent with the Council’s own Topic Paper: Transport at paragraph 5.88, which reports that “Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start(ing) until 2024 at the earliest, with construction taking 2½ years.” This would mean that the capacity would only become available in 2027 at the earliest, in effect postponing by some years the Plan’s aspiration for A3 widening.

20. On funding, there is no clarity where the money for A3 widening would come from, even if it did surprisingly pass the value-for-money test. The proposed submission Local Plan has been amended from one year ago in the Infrastructure Schedule in Appendix C to give the impression that developers are now expected to foot more of the bill, further adversely affecting the viability and deliverability of Blackwell Farm. The change states the funding source will be ‘Highways England and developer funded’ instead of ‘Highways England and developer contributions’.

21. Finally, the exorbitantly expensive, damaging and disruptive widening of the A3 cannot be expected to achieve its objective of alleviating traffic flows sufficiently to accommodate effectively traffic from Blackwell Farm. Congestion will, remarkably, be worse with the A3 widened than without it. The SHAR reports in paragraphs 4.8.4-6:

> “4.8.4 Table 4.1b shows in the PM peak that while the network performs better in Scenario 5 [i.e. with the A3 widening in place] compared with Scenario 3, it is still worse than in Scenario 1 with vehicle hours higher and vehicle speeds lower by 12% and 2% respectively.

> 4.8.5 As noted above in Section 4.5, the capacity increases on the M25 and A3 result in some high flow increases as trips re-route to make use of the improvements. In turn, this affects roads approaching the A3, such as the A320, A31, A25 and B3000. These also see high flow increases with some, such as the A320, experiencing a significant deterioration in the Level of Service.

> 4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.”
22. The Borough Council’s own evidence in both the SHAR and Arup report is that widening the A3 will increase congestion in the town rather than relieve it, with associated deterioration in air quality, noise impacts, land use impacts and severance. Blackwell Farm would damage the whole of Guildford. The likelihood of the A3 capacity being increased is less now than it was one year ago. So far as we can see, the ‘do nothing’ option for the A3 remains squarely on the table and is an increasingly likely outcome.

23. In summary, the evidence on the A3 consolidated during the last year shows that it is currently simply not known:
– if a suitable widening scheme can be designed and if so how much it would cost;
– whether the scheme would meet ‘value for money’ tests;
– whether the money for it could be found;
– whether the A3 capacity could be increased in time to assist the development of Blackwell Farm during the Plan period, as the earliest provision date would be 2027 (and probably later). Finally, even if built, the widening of the A3 would generate congestion in Guildford rather than relieve it and would itself be even more over-capacity than it is now. The Borough Council’s reliance on the A3 capacity improvement is foolhardy in the extreme. Not proceeding with the Blackwell Farm development would be a far superior option.

24. The Council recognises that the Blackwell Farm development cannot proceed until the A3 has been widened, but realises that this cannot be achieved until, at best, near the end of the Plan period. As a result of the lack of progress in agreeing A3 capacity increases, the rate of provision of houses in Policy S2, which was back-end loaded in the 2016 Proposed Submission, is now in the 2017 Proposed Submission still more heavily skewed towards the end of the plan period. The 2019-20 provision has been dropped from 500 to 450, while the annual provision in the last three years of the Plan has been raised from 790 to 850. There is insufficient evidence to show that 850 dwellings per annum could be constructed and sold in the Borough in those last three years: the numbers reflect not how the housing market works, but the contortions which the Council has gone through to square its housing provision numbers with the aspirational timetable for the widening of the A3. A far superior option in both housing and transport terms would be to abandon both the Blackwell Farm development and the A3 widening (which in part is justified by Blackwell Farm as well as facilitating it).

Access from the A31 Hogs Back

Junction with the A31

25. The principle of a new signalised junction on the A31 to facilitate access to Blackwell Farm is project LRN3 in the Infrastructure Schedule. The Plan accompanying Policy A26 Blackwell Farm is unchanged from June 2016. It continues to show a road access at a widened junction of Down Place with the A31, passing over the A31 slip road onto the A3 northbound. Our response to the June 2016 Consultation demonstrated, in a commissioned report from transport specialists, that the proposed signalised junction at Down Place with the A31 would be most unlikely to function effectively. Furthermore, Surrey County Council’s Strategic Highway Assessment Report June 2016 shows that the new junction would cause all users on average a 35 second delay compared with no junction (Table 4.11). In the last twelve months the Borough Council has been forced by a Freedom of Information request to release a sketch map provided by the University of Surrey showing the latest proposals for this access. This involves a junction slightly west of the site originally intended but shows no distance measurements. Also it shows an extra westbound lane for traffic on the A3 over-bridge but no bridge widening. There appears to be no proposal to co-ordinate this junction with improvements to the Down Lane junction on the opposite side of the A31 slightly to the east, even though the creation of the Down Place access could ordinarily be expected to generate significant additional use of Down Lane.

26. The lack of transparency by the Council is significant: unless demonstrated otherwise, we consider that the proposed access at Down Place is likely to remain impractical for the following reasons.
– There does not appear to be sufficient road width for the proposed junction.
– A signalled junction is likely to be over-capacity at peak periods.
– Travellers leaving Blackwell Farm this way in the morning peak will suffer major tailbacks due to the overloaded A31 eastbound inhibiting left turns (the peak flow direction).
– Widening of the A3 over-bridge may well still be necessary at vast cost.
Access road between the A31 and Blackwell Farm

27. Project LRN4 in the Infrastructure Schedule is an access road at Blackwell Farm with a through link to Egerton Road. The Plan continues to give the misleading impression that “The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV” (Infrastructure Requirements item 2). A significant road connecting to the A31 could not possibly be achieved by an ‘improved Down Place access road’, the route of which is narrow, lined by mature trees on both sides, and includes a significant sharp bend, while any alternative could not possibly be sympathetic to the AONB and AGLV. The construction of an access road through an AONB to a new urban extension would be major development in its own right. This could only be justified in AONB policy terms if there were exceptional circumstances. There are none of these and none are claimed or demonstrated.

28. The principal difficulty which has arisen in the last year regarding the new link road is that the Council has been unable to find a workable solution for the local road network. The Council wants residents of Blackwell Farm and employees at the Research Park to be able to enter and leave either in the Guildford direction or the A31 direction, but it does not want most other drivers to use the same roads if they don’t really need to be there. There appear to be two intentions: to constrain drivers who are just passing through - so as to avoid rat-running (especially necessary if a direct through route can be found south of Manor Copse) - and to avoid attracting drivers who currently use Egerton Road. In both cases the intention is to avoid causing adverse network effects if drivers divert onto the new link, e.g. rat-runners overloading Egerton Road still further, or the new access prompting more traffic on the A31.

29. Policy A26 in the June 2017 Proposed Submission Local Plan sets out its solution: to provide a new route “between the A31 Farnham Road and Egerton Road” for “employees and emergency vehicles” (only) to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital. We address in this section the practicability of selecting users for the public highway. However, the matter is also linked to the separate issue of how to link Blackwell Farm into Egerton Road, the main road into Guildford (see paragraphs 47-50).

30. We have tried for the last year to obtain from Guildford BC and the County Highways Authority an understanding of exactly how users of the proposed new road network would be restricted to those people deemed suitable, with everyone else barred. No credible explanation has been provided. The matter is completely ignored in the Borough Council’s Topic Paper: Transport (June 2017) and Strategic Highway Assessment Report Addendum (June 2017), and is restated but not explained in Guildford Borough Transport Strategy 2017 (June 2017). This is an issue which cannot be brushed under the carpet because it lies at the heart of the credibility of the link to the A31.

31. The local authorities have been thinking about the issues raised but failed to find an answer after another year of investigating. Surrey County Council has indicated that its preferred option is the use of Automatic Number Plate Recognition (ANPR) coupled with a permit system. However, there is a general right of public access on the public highway without the State snooping on who uses it by means of cameras, so the legality and practicality of any control system remains to be resolved. For this method to function, therefore, we anticipate that cameras would have to monitor passage on private roads, raising the prospect that Blackwell Farm might not be fully accessible on the public road network. It remains unclear what would happen to drivers whose number plates were not ‘authorised’ to use the road, or how they could be discouraged from arriving in the first place. If there was a system of fines for unauthorised use of the road link, this would require the co-operation of public authorities in perpetuity (which would need to have ongoing funding from the development). With private roads, control of the network would be lost to a private interest whose priorities might not always be the same as those of a public authority. Rights of access to the private roads could at any time be changed by the landowner by reference to which vehicles were allowed passage, when, at what cost, or in other ways. We would expect an urban extension to Guildford reliant on access and egress by private roads to be fundamentally unacceptable.

32. It is unclear whether Guildford BC appreciates the impracticability of the proposed differentiation between acceptable and banned users of the road. There will be thousands of ‘legitimate’ drivers resident in the Blackwell Farm housing development. There will be many hundreds of employees in the Research Park and its proposed extension. There will be hundreds of staff on the Manor Park campus and at the Hospital. Identifying these individuals and, specifically, the cars
they will be driving would be a nightmare, made worse by staff turnover and churn in the occupancy of the housing development. Legitimate individuals may have good cause to use alternative cars. The newly introduced secondary school would be largely (two thirds) for the benefit of non-residents of the Blackwell Farm development, so large numbers of drivers can be expected to arrive from elsewhere using the link road, and would need to be registered. Many others will claim legitimate cause for registration on the ANPR system, such as staff at the Nuffield Hospital as well as the County Hospital, employees of shops and services in the area, taxi drivers and so on. The system of registration would become very large and unwieldy, requiring continual (and rapid) update, at real cost. A reliable and effective appeal system would be needed, but the frustrations of both registered and especially non-registered users of the road are still entirely foreseeable.

33. As the transport consultant to Compton and Worplesdon Parish Councils notes, the inevitable complexity of an ANPR process raises a series of questions related to site deliverability such as:

i) Will the developer provide for the financial enforcement costs of the link road restrictions in perpetuity? Is this included within the £20million cost for LRN4?

ii) Will Surrey Police provide the enforcement of the ANPR in perpetuity?

iii) How will all of the people who will be granted access to use the road be differentiated from through traffic?

34. Answers to these questions and resolving other practical concerns are fundamental to the successful deliverability of the vehicular link road and the urban extension as a whole. The road must not attract unwanted road users, but must still achieve the aim of serving all of the desired users. So far the Council has offered no commentary at all on how these awkward issues might be resolved, or on how the use of private roads to achieve a public purpose can be made to function without unacceptable risks of unilateral action by the landowner.

35. The outcome seems to us clearly inevitable if a link road is built. It will not be workable. Instead of a costly system of registration, fines, appeals, etc., the greater likelihood is that the foreseeable cacophony of opposition to a system which appears indiscriminate, unfair and ineffective will cause the system of ANPR and registration to be abandoned in a short order of time. All the disadvantages of the link road to the wider network would then be realised.

Impact of the link road on air quality in Compton

36. New information on air quality has become available since the consultation on the Proposed Submission Local Plan in 2016. In particular, Guildford Borough Council has issued an admirably brief and clear 2016 Air Quality Annual Status Report, September 2016. This shows that a specific area of the B3000 road through the village of Compton (in whose parish Blackwell Farm partially lies) has one air quality monitoring position which consistently reveals concentrations of Nitrogen Dioxide (NO2) well in excess of the legal limit adjacent to a dwelling (and the highest figure in the Borough). This is the only location in the Borough where this combination arises. (There were two other places with lesser exceedance of the legal limit, but one was located well away from dwellings and the other was unreliable having only 33% data capture rather than the 75% required.) Other monitoring positions nearby in Compton had NO2 pollution approaching the legal limit.

37. There is no doubt whatever about the cause of the pollution problem: through traffic passing through the village. Large numbers of cars pass through and lorries on the relatively narrow road can cause additional congestion. Further monitoring and modelling is taking place to ascertain whether any further action is required, notably using Advanced Dispersion Modelling Software (since June 2016). The Guildford Borough Transport Strategy 2017 reports that in respect of Compton “The Council is considering whether to declare an Air Quality Management Area and, working with Surrey County Council, will use the results of an ongoing study looking at the pattern of daily exposure to design and implement appropriate mitigating measures” (page 19). The Council has proposed no means of achieving in the short term a permanent reduction in traffic volumes through Compton. On the face of it, an AQMA may well therefore already be needed: under its legal duties the Council must designate one if it is unlikely that the objective values (i.e. less than 40g/μm3) will be met in a given timescale, and the Council must then prepare an Air Quality Action Plan (AQAP) with the aim of achieving value objectives.

38. The vehicle count through Compton will rise alarmingly if the Blackwell Farm development and the associated A3 widening are built, inevitably necessitating an AQMA and with little or no prospect of an AQAP being effective. For vehicle impacts, the SHAR treats development of Blackwell Farm and accesses to it as a two-stage process: ‘Scenario 3’ involves the construction of key highway schemes providing access to large development sites (incl. Blackwell Farm)
and local highway schemes, while ‘Scenario 5’ involves the widening of the A3 at Guildford (A320 Stoke interchange junction to A31 Hog’s Back junction). The traffic consequences of each are modelled separately. In practice, as established in paragraph 12 above, there is common ground between the Borough Council, County Council and Highways England that the Blackwell Farm development cannot proceed until the A3 has been widened, so in practice the highways impacts of the site access road and A3 widening are additional if Blackwell Farm is to proceed.

39. The SHAR shows in Figure 4.3 for the morning peak hour that 275 vehicles will leave the A31 at Down Place (for Blackwell Farm, the Surrey Research Park and County Hospital). Paragraph 4.7.5 suggests that these are trips which primarily have their origin in the west, (though the likelihood is that many of them will have actually their origin in the south: traffic from Godalming and Farncombe, for example, could access the A31 at the Puttenham junction and then head for the Research Park or Hospital while avoiding Guildford.) In short, a proportion of the 275 vehicles using the Down Place junction under Scenario 3 will have passed through Compton. Unfortunately, the network effects diagram shown in Figure 4.3 does not extend southwards to Compton to identify an indicative number.

40. The SHAR then indicates the impact of Scenario 5 compared with Scenario 3. This is reported for Compton in Table 4.5, showing that the B3000 through Compton will have one of the highest absolute increases in flow arising from the widening of the A3, with an additional 145 vehicles per hour in the morning peak, representing a further 16% increase in traffic through Compton. The Table notes that both under Scenario 3 (even without the A3 widening) and under Scenario 5 the Level Of Service on the road would be category E: ‘Unstable flow operating at capacity’. The outcome could be even worse: the SHAR notes at paragraph 4.7.5 that potentially the number of drivers attracted to use the new Down Place to Blackwell Farm link could be somewhat higher as the model cannot accurately reflect the queuing that occurs on the nearside lane of the A31 as it approaches the merge with the A3. If so, the numbers passing through Compton could be expected to increase proportionately.

41. The evidence is clear that the combined effect of the Local Plan’s proposals for the Down Place link road to Blackwell Farm and the A3 will greatly increase traffic through Compton which in turn will have an inevitable and appalling impact on air quality (which already exceeds legal limits at one location). Despite this, the Council is in denial about the air quality impacts of its Proposed Submission Local Plan 2017. Aecom have prepared for the Borough Council an Air Quality Review of Guildford Borough proposed Submission Local Plan: Strategy and Sites “June 2017”, but this completely fails to appreciate the relationship between the Blackwell Farm development, the proposed road infrastructure developments and air quality at Compton. It provides a series of unwise statements:

(i) “it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective in to the future, without additional measures being required locally” (section 2.3). The reference to little development in the area is absurd: a major urban extension is proposed in the Parish. The suggestion that technological advances in emissions will solve the problem is fanciful in anything other than the long term, whereas there is an immediate need for action to reduce vehicle passage through Compton.

(ii) “The assessment identified a risk of exceedance if traffic flows, primarily on the B3000, increased. The area was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO2 concentrations measured in the area” (section 4.1). This finding is simply wrong: Table 4.5 of the SHAR anticipates a 16% increase in traffic in Compton from the A3 widening, not counting any increase generated along the Down Place link road.

(iii) A review of Policy A26 Blackwell Farm (section 5.2.2.1) recognises that “A large development such as this is likely to have an impact on local air quality as there are likely to be large changes to traffic flows on nearby roads and thus impacts on pollutant concentrations”, but failed to realise the consequences for Compton, even though this is nearby and clearly the place with the worst NO2 pollution recording in the Borough (which should obviously be one of the first places to examine for air quality consequences).

(iv) A review of the air quality impact of the Local Plan on Compton (section 5.2.4) similarly fails to appreciate the evidence. This states in full: “There is one large land allocation within the parish of Compton, A26 Blackwell Farm, discussed above. The additional traffic flows predicted to be generated by this development are not predicted to have a significant adverse effect on air quality in the area of the village of Compton. There are no other large allocations local to
Compton Village. As a result the implementation of the GBC Draft Local Plan should have little effect on future traffic flows through the area and thus negligible impact on local air quality.”

(v) Rather than address the air quality consequences of Blackwell Farm at the Local Plan stage, when decisions can still affect air quality in Compton, Aecom choose to defer any consideration of the issue until a time when little can be done about it. On four occasions in the Executive Summary the issue is recommended as a matter which can be dealt with ‘through the planning application process’. Once allocations of land are made for development, strategic reasons for resisting them (e.g. on air quality grounds) are typically overruled as matters which should have been resolved at the plan-making stage. Leaving air pollution consequences of proposed development until the planning application stage is an exercise in trying to sweep the issue under the carpet.

42. Aecom’s recommendations in section 5.4 recognise that “The increase in traffic flows associated with the implementation of the Draft Local Plan are predicted to be in the region of 12,500-17,000 vehicles per day on the Guildford Bypass [A3]”, but seem to assume – extraordinarily – that no extra vehicles will pass through Compton (despite the evidence in the SHAR). In our view, the Aecom report and its recommendations represent a significant failure to respond to clear evidence of the air quality damage that the Blackwell Farm development as a whole and the associated A3 widening would inflict upon Compton, about which little could then be done in the short term. We wholly disagree with its approach, which could threaten life-expectancy in Compton.

43. It is hardly surprising that air quality is barely mentioned in the Sustainability Appraisal and treated as a minor issue, as Aecom also prepared this for the Borough Council: paragraph 10.7.1 final indent merely recommends that ‘detailed modelling’ is undertaken close to where very large increases in traffic flows are expected. Paragraph 10.7.7 concludes “Proposed changes to the spatial strategy have little or no implications for health, whilst proposed changes to site specific policy (particularly regarding air quality; see discussion above), responding to the Air Quality Review (2017), are supportive of good health.” Again key decisions are to be left until too late until the planning application stage, with both the SA (at paragraph 10.7.1) and the Air Quality Review (at page 5) recommending that ‘potential air quality issues’ should be added to the list of ‘key considerations’ at the end of the main urban development allocation policies, including Policy A26 Blackwell Farm. This has been taken up by the Borough Council. However, the SA fails to address the key issue that needs resolution now: how to stop additional traffic being attracted through Compton or reduce it.

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

Attached documents: LP2017 - Response to GBC Reg19 by SHB ComptonPC Jul17 v4 - Green Balence.pdf (625 KB)

[continued]

Linking the Research Park Extension to the road network

44. The expansion of the Surrey Research Park and the creation of the Blackwell Farm estate are treated as part of the same development in Policy A26. In access terms it is more sensible to consider them separately. The Research Park
proposal is for an Extension of 10-11ha, which would be to the north-west of the current Research Park. Access would be straight-forward from Guildford: via Egerton Road and Gill Avenue, via the roundabout serving the Research Park by the Occam Road/Priestley Road loop, and by making an extension to Stephenson Way. A road serving the Extension could be taken through the mature hedgerow separating the existing Research Park from Blackwell Farm at a point close to and parallel to the railway line. Stephenson Way has been constructed to allow further extension of the roadway in this location (also giving access to some of the last remaining large vacant sites on the current Research Park). Proposals for the Sustainable Movement Corridor in the June 2016 ‘Progress update’ as part of the evidence base for the Proposed Submission Local Plan at that time were consistent with this. They showed in Figure 5 a schematic route for the SMC. This is reproduced on page 16 of the Guildford Borough Transport Strategy 2017. At its western end this turns north from Gill Avenue, apparently to follow Occam Road and Priestley Road, before making a westward thrust into the Research Park extension area (though whether north or south of Surrey Satellite Technology is difficult to say from the scale of the plan provided). So far as the Research Park Extension is concerned, that would seem to be an understandable direction in which to take the Sustainable Movement Corridor.

45. However, this arrangement would introduce development into Green Belt and the setting of the AONB at Blackwell Farm, breach the excellent existing screening of development from the west, add substantial additional traffic to the heavily congested Egerton Road, and in all likelihood be opposed by existing users of the Research Park who would be unlikely to want a significant thoroughfare in their midst. We therefore consider this proposal unacceptable. We note, too, that the proposed SMC may now stop short of the Research Park Extension (at the roundabout on Gill Avenue at the top of the hill), as indicated in the Sustainable Movement Corridor – Update 20 February 2017 in Figure 4. How or whether the SMC would link into Blackwell Farm or the Research Park Extension has become a mystery.

46. We do not accept that the sensibilities of existing staff in the current Research Park should dictate the most appropriate access route to a Research Park Extension. However, if the intention (and this is unstated in the Local Plan) is that the Research Park Extension could only proceed if a new road link was made to it from the A31, to avoid access only through the existing Research Park, there would be even less justification for the development going ahead. Not only would the scheme still intrude into Green Belt and the setting of the AONB at Blackwell Farm. It would also be partly responsible for requiring major development of a road in the AONB and so could only be justified in “exceptional circumstances” (which it has neither claimed nor demonstrated). Given that the Extension would now be physically separate from the existing Research Park, it would be unable to claim Blackwell Farm as an essential location. So far as we can see, the Extension does not need to be in this location at all, and a more fundamental review of its future location would be in order. That would also help avoid traffic growth on Egerton Road.

**Linking Blackwell Farm to Egerton Road and the Tesco roundabout**

47. How the Borough Council and the County Highways Authority propose to link the Blackwell Farm development into Egerton Road preferably via Gill Avenue, in accordance with the Proposed Submission Local Plan 2017 Policy A26, remains unclear. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. One option has recently been lost by the construction of the substantial School of Veterinary Medicine on the line of one possible access road. We consider the Proposed Submission Local Plan to be delerious in its duty to demonstrate how such a major urban development on the edge of Guildford can in reality be linked into the fabric of the town. The Borough Council is plainly having great difficulty finding a suitable access route. We strongly recommend that the Local Plan should not be submitted for Examination unless this route can be clearly identified first.

**Impact of Blackwell Farm and the Research Park development on the local road network**

48. Egerton Road is one of the worst congestion hotspots in Guildford and the wider area. Egerton Road provides the main access to the Surrey Royal County Hospital and a superstore, and the only access to Surrey University’s Manor Park student village, Surrey Sports Park and the entirety of Surrey Research Park. The demand for access to all these destinations is growing, notably with building programmes at Manor Park and the Research Park. The high level of existing congestion will therefore get worse, even before Blackwell Farm is contemplated. Egerton Road is accessed principally from Guildford to the east but its capacity is fundamentally constrained by the pinch-point of the A3 underpass, which is a single-carriageway road capable of providing for two lanes of cars each way (but not wider
vehicles). Overloading of the roundabouts at either end of the underpass, which both have links to the A3 and other destinations, also act as pinch-points for traffic from numerous sources and cause traffic to back up onto the roads into them (even onto the A3). The likely additional traffic generation at the Egerton Road/Gill Avenue crossroads, immediately west of the Tesco Roundabout, was noted in paragraph 6 above.

49. The concept of adding the major Blackwell Farm estate and a 10-11ha Research Park extension, both accessed from Egerton Road, without any significant vehicle capacity increase on Egerton Road itself, seems astonishing to the point of being hardly believable. The Strategic Highway Assessment Report June 2016 accompanying the Proposed Submission Local Plan a year ago stated of the Blackwell Farm development: “in Scenario 2, without either new highway schemes or specific access arrangements, trips from Blackwell Farm load onto the A31. But with the access arrangements modelled together with an access road through the development to the Surrey Research Park, this assessment indicates that significant pressure could be placed on Gill Avenue, the Hospital junction and other parts of the network in that area” (paragraph 4.5.4). Paragraph 4.9.5 of the SHAR specifically identifies that “the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.”

50. In addition to this, in the last twelve months, the Proposed Submission Local Plan 2017 has upgraded the importance of Egerton Road to the purpose of providing access to Blackwell Farm, compared with the 2016 Plan, in that the alternative proposed access to Blackwell Farm via the A31 is no longer designated as the ‘primary’ access and Egerton Road is no longer designated the ‘secondary’ access. They now have equal status. Whereas this properly reflects the implausibility of an acceptable link to the A31, no change whatever has been proposed to Egerton Road to accommodate such extra traffic as may now be expected to take this route (which is unspecified). In our view, the additional traffic congestion impacts on an already overloaded local network are so foreseeable dire that we strongly recommend the Blackwell Farm development should not be taken forward.

**Sustainable Movement Corridor**

51. Back in 2014 Arup prepared a report *Guildford Town and Approaches Movement Study* for the Borough Council, a vision statement on transport in Guildford to 2050, which included a very broad indicative route at a scale that was difficult to apply on the ground. This has been endorsed by the Council. The purpose was to facilitate sustainable movement, strongly emphasising public transport, walking, cycling and demand management at the expense of travel by private car. The centrepiece of the scheme was a corridor segregated to be available to fast buses (and possibly trams), cyclists and pedestrians, linking the key existing areas of the town that are drivers of growth. There would be new bridges over the railway (in the town centre) and over the River Wey (across the floodplain near Stoke Lock). The estimated total cost was broadly £75-100 million though clearly not costed in detail. Cars would be banned from the Corridor which, because it would be based on using existing roads, some of them major roads, would represent a highly significant reallocation of space away from cars to buses, cycles and walkers, with consequent impediments to car usage. Car parking charges would be increased, 20mph zones introduced, some roads be closed to through traffic and others pedestrianised. The Proposed Submission Local Plan supports this kind of corridor but, strikingly, none of these intentions and assumptions is made clear in the 2016 or 2017 Consultations.

52. The 2016 Consultation proposed a Sustainable Movement Corridor, included in the Plan at the last moment (Spatial Vision, Policy I3 and paragraph 4.6.24). Various land allocation policies required co-ordination with the Corridor. Paragraph 4.6.24 explained that the Sustainable Movement Corridor would link major developments to Park-and-Rides, including Blackwell Farm (at its western end), and stated that the Corridor would be ‘largely on existing roads’. ‘Route sections’ were listed in the Infrastructure Schedule (Appendix C) with six itemised segments with some broad cost figures suggested (£80-90m in total). No route for the Corridor was included in the Plan, but instead the evidence base included a *Progress Update on the Sustainable Movement Corridor scheme* (GBC, June 2016). This showed a revised figurative route and possible road layouts at some key junctions and sections. It showed variations from the Arup study, notably with: a spur to Slyfield based on the existing A320 rather than a river crossing further east and also a lengthy new corridor up the A3100 to Gosden Hill Farm. The Arup Corridor would be downgraded in many lengths to shared roadspace with existing traffic (i.e. normal roads) but with bus priority measures. A land bridge over the A3 to provide a connection to the Research Park was downgraded to using the existing Egerton Road underpass: the recommendation was “to consider further the potential for tidal bus lane on Egerton Road as it passes under the A3 trunk road, with signalised
control at either end controlling its use by buses, whilst retaining two working lanes of general traffic. It would be anticipated that the tidal bus lane would be used westbound in the morning peak period and eastbound in the evening peak period.” Changes to the Tesco roundabout would also be needed. Development would begin in the town centre and be phased later for other sections (to 2033).

53. The 2017 Consultation has made little progress on the Sustainable Movement Corridor. Policy ID3 now mentions a Supplementary Planning Document on the topic, but there is no sign of this even in first draft despite the passage of another year. This is an unacceptably inadequate basis upon which to plan for major urban development at Blackwell Farm. However, a further report Sustainable Movement Corridor – Update published in February 2017 does for the first time include a published small-scale street map on which the Sustainable Movement Corridor (SMC) is superimposed and clearer proposals for an initial western section. However, the Council clearly have insufficient confidence in this to include it in the Local Plan. The 2017 Update shows changes from the 2016 Update, notably with an additional crossing of the railway beside Yorkie’s Bridge and an additional north-south corridor along Woodbridge Road and Onslow Street between the A25 and the gyratory.

54. The Sustainable Movement Corridor will measure its effectiveness by a substantial degree of modal shift away from cars and towards sustainable transport modes. The starting point for analysis is that the Strategic Highway Assessment Report 2016 assumes no modal shift to sustainable modes, and so is a ‘worst case’ in respect of cars (paragraph 4.1.8). Paragraph 4.6.28 of the Proposed Submission Local Plan 2017 now states that “the site allocations and proposals in this Plan – including the significant programme of schemes to provide and improve opportunities to use active modes, bus and rail – are intended to result in a modest modal shift over the period to 2034”. However, the Council has accepted that this is unlikely to be enormously effective: the same sentence continues “we forecast that there will also be an absolute increase in overall traffic volumes.” Instead the paragraph proposes to ‘increase highway capacity’. This is a downgrading from the intentions just a year ago, when paragraph 4.1.8 of the SHAR stated “The impact of these sustainable transport schemes is expected to be significant”. What, therefore, is the Council’s objective?

55. The key section of the SMC for Blackwell Farm is the western section. At the key pinch-point of the A3 underpass, the Sustainable Movement Corridor can only function if the existing four lanes for vehicles are reduced to three, with one of these lanes taken up as a bus lane based on tidal flow routing. Space for other vehicles would be halved. The Proposed Submission Local Plan 2017 together with the main transport documents supporting it (the Guildford Borough Transport Strategy 2017 and Topic Paper: Transport, June 2017) are silent on whether this will be implemented, but as it is a key feature of the SMC, which could not function without it, we assume that this is what is proposed. Furthermore, the Tesco roundabout diagram in the 2017 Update document shows no roadspace at all reallocated to the Corridor west of this point.

56. The Council does not appear to have modelled the network consequences of creating the western section of the SMC (or any other section). With the Blackwell Farm development completed, the SHAR forecasts (Figure 4.3) that, in the morning peak hour, there would be 837 movements westbound and 636 movements eastbound along Egerton Road through the underpass (one vehicle about every 4 seconds and 6 seconds respectively). The underpass is highly unlikely to have the capacity to accept this level of traffic on a single lane each way. That would still be the case after modest modal shift had reduced the vehicle counts somewhat. It seems to us unrealistic to believe that all traffic inhibited by denial of road space will divert to sustainable modes. The more likely effect is that the SMC will simply add greatly to the predicted overcapacity on Egerton Road, with knock-on effects through the network. The principal effect of the SMC in the Blackwell Farm area is therefore likely to be to make traffic congestion worse rather than better if the development is built.

57. The footpath and cycleway on the north side of Egerton Road, segregated from traffic but not from each other, would be maintained under the proposals in the 2017 Sustainable Movement Corridor – Update, though the current design is cramped and mostly unattractive. The footpath and cycleway cease east of the Tesco roundabout, so walkers and cyclists have to fend for themselves when crossing the Ashenden Road arm of the Tesco roundabout. No improvement even to this basic problem is proposed in the Plan. The Plan needs to be clearer about what if anything it is actually proposing in order to encourage walking and cycling to and from the Blackwell Farm development.

58. If the modal shift fails to happen, the level of congestion in Guildford will become significantly worse. Modal shift is the only means by which the Council can find any practical means of moving additional people at scale into and out of Blackwell Farm (and the associated 10-11ha expansion of the Research Park). Even so, given the existing very high
levels of congestion and over-capacity on Egerton Road and Gill Avenue, especially in peak periods, there is no certainty
that there will be sufficient roadway for vehicles, people and goods to reach the Blackwell Farm development even after
the Sustainable Movement Corridor has taken a proportion of travellers (itself taking up roadway).

59. The Council has not demonstrated a credible strategy for actually achieving modal shift in practice, notably by
removing both roadway for cars and destination car parking spaces. Modal shift is not mentioned in Policy A26, despite
its imperative importance to the delivery of Blackwell Farm. The strong impression given by the Plan is that the SMC has
been greatly downgraded from the original proposals by Arup to which the Council subscribed, and is therefore unlikely
to deliver the modal shift which is essential for the development proposals in the Plan to be feasible. It seems to us that
the likelihood is that the Sustainable Movement Corridor in the Blackwell Farm area will be massively inadequate. As the
Council’s heart does not appear to be in modal shift, we consider that the Blackwell Farm proposal will be undeliverable
and we recommend that the proposed allocation in Policy A26 is withdrawn.

60. The purpose of the SMC can only be achieved by upsetting car drivers. However, the Plan strongly emphasises
accommodating traffic generation from proposed development with figures apparently incorporating: no modal shift at
all; a sustained aspiration for a major increase in capacity on the A3; and continued investment in local road capacity
improvements. We conclude that the Sustainable Movement Corridor has already been compromised, will fail to make
discernible impacts on existing congestion, and will therefore not have anything like enough impact on travel patterns to
accommodate the people and goods movements arising from 1,800 houses at Blackwell Farm. We recommend that the
Local Plan should not be submitted for Examination without deletion of the Blackwell Farm proposal in Policy A26.

Funding the transport infrastructure necessary for Blackwell Farm

61. We pointed out in our submission a year ago that the scale of financial support expected from the developers of the
Blackwell Farm site for the delivery of road infrastructure alone was far above the amounts normally expected. In the last
year the obligations upon them have increased. The Proposed Submission Local Plan has now been amended in the
Infrastructure Schedule in Appendix C. Proposals affecting the A3 were noted in paragraph 20 above, to which Blackwell
Farm developers will be a party. Other new financial commitments specific to Blackwell Farm are:
– Project BT6 ‘Significant bus network serving the Blackwell Farm site and key destinations including the existing
western suburbs of Guildford and the town centre to be provided’ is a new requirement in 2017, which must be entirely
funded and delivered by the developer, at a price which is still to be confirmed, and therefore an open-ended commitment
at present;
– Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell
Farm site’, which must be entirely funded by the developer, has seen its cost increase from £5m to £10m;
– The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN3 ‘New
signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)’, which is
likely to increase financial obligations on the developer;
– The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN4 ‘Access
road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)’, which is likely
to increase financial obligations on the developer;
– The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN5
‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’,
which is likely to increase financial obligations on the developer;
– A “Necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station” towards the
estimated £10m cost of Project NR2 will still be required from the Blackwell Farm developer (the only named developer
required to contribute) in accordance with Policy A26 Infrastructure Requirement (7): this assumes greater importance
now that the station merits its own Policy A59 (see paragraphs 63-64 below);
– The funding arrangements for SMC1 Sustainable Movement Corridor: West have been amended slightly. The change
states the funding source will be ‘Developer funded and Local Growth Fund’ instead of ‘Developer contributions and
Local Growth Fund’, suggesting that the developers will have to fund somewhat more than previously expected. The
Blackwell Farm development will be the principal contributor to this section of the SMC.

62. Transport consultants advising Compton and Worplesdon Parish Councils calculate that the transport infrastructure
alone for the Blackwell Farm development will cost about £60million, most of it up-front. This is around £35,000 per
dwelling. There will be other major costs which the developer will be required to fund, including new primary and
secondary schools and affordable housing (none of which were included in our previous costings), all of which can be
very expensive, and numerous other mitigation costs from such a major development. There is, therefore, a real risk that the proposed development will not be viable and deliverable. If still included, the Local Plan would need to ensure that the Blackwell Farm development complies with paragraph 173 of the NPPF on this point. In reality, in the absence of other funding sources to provide money which the developers may be unable or unwilling to provide, the Blackwell Farm scheme would have to fail and be deleted from the Plan.

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

Attached documents: [LP2017 - Response to GBC Reg19 by SHB ComptonPC Jul17 v4 - Green Balence.pdf](625 KB)

Comment ID: pslp172/2670  Respondent: 15278689 / F Robertson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

The access on to the A31 and the A3 with signals will jam two roads that are currently only rarely running freely during rush hour. It will make a questionable route almost impossible during those times. Astonished to read that this is deemed a viable way to 'drain' traffic generated from this site, a site which is truly not viable regarding the current proposed access to it, and is most unwelcome locally anyway. Air quality concerns aren't trivial either - they are of huge significance and alone reason to halt this plan.

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

Remove policy A26 from the local plan.

Attached documents:

Comment ID: PSLPS16/1263  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

The northern part of this site allocation is considered to be an area of medium sensitivity in Green Belt terms with the southern part of the site (adjacent to the A3) considered to be of High Sensitivity. Whilst the main part of the site might only satisfy two of the ‘four purposes’ that support the inclusion of land within the Green Belt such an assessment ignores the very significant contribution the site makes to the ‘openness’ of the Green Belt and the fact that this area defines the rural boundary to the west of Guildford. In addition, the site is clearly visible from the higher ground to the south and west which forms part of the Surrey Hills AONB and acts as a buffer between the built up area and this nationally designated landscape. Miller would argue therefore, that the site’s Green Belt sensitivity is in fact far greater that the restricted assessment undertaken in the GBCS suggests.

Indeed, it is noted that a recent independent landscape assessment of the site, undertaken on behalf of the local Parish Councils, suggests that the landscape satisfies the criteria that would justify it inclusion within the AONB. Miller would suggest that the importance of the landscape needs to be determined prior to the confirmation of this allocation; in circumstances where the AONB is national designation where development should only be allowed in ‘exceptional circumstances’.
In addition to the above, Miller is concerned that the site lacks any significant infrastructure and suffers from extremely poor highway access. In particular, Miller would question the suitability of the proposed Down Place access off the A31, which would need to be signalised on an important section of the A31 that already suffers congestion at peak times. However, Miller is of the view that there does not seem to be any other access point from the A31 or A3 due to environmental and physical constraints.

Miller is concerned also about the potential for a ‘secondary’ through route from the A31 via Gill Avenue, to Egerton Road, to be created to avoid the existing A3/A31 southbound junction. It is considered that this proposed route, which already serves the Science Park, the University Campus and the Royal Surrey County Hospital is already at capacity and would not be able to accommodate any further traffic associated with the additional housing/employment allocation and the new two-form entry primary school.; all of which would generate a significant number of peak hour trips.

Miller would question whether the necessary mitigation needed to reduce the impact of the increase in traffic on the local network could be provided in circumstances where over recent years significant improvements have been implemented to the junction of Gill Avenue/Egerton Road yet the network still lack adequate capacity. Furthermore, the constraints in the physical capacity of the local highway network do not seem compatible with the proposed SMC which seeks, in particular to prioritise bus movements.

As with the other major housing allocations Miller considers that the highway infrastructure improvements are a prerequisite of development and that in circumstances where the RIS improvements to the Guildford section of the A3 are not scheduled until late in the plan period very serious doubt remains about not only the suitability of this allocation but about its viability and deliverability.

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

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<th>Comment ID: pslp172/4888  Respondent: 15284929 / Sally Vass  Agent:</th>
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<th>Comment ID: PSLPS16/1353  Respondent: 15298881 / Mela Davidson  Agent:</th>
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While visiting Compton yesterday I found a rather emotive flyer tucked under my car windscreen and wish to respond.

The development appears well planned and aimed at providing affordable housing and facilities for real working people who are the backbone of our society. They deserve somewhere to live, too.

I have recently spent quite a bit of time in the Royal Surrey Hospital and people such as nurses deserve to have affordable, attractive and convenient housing. They may be having long commutes from out of the area to work at the hospital now and so their cars are already causing pollution which would be lessened if they were able to live and work locally.

The university is a vast contributor to the economy of Guildford as well as having a growing international importance and there should be suitable housing for its employees too.

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

Attached documents:

Comment ID: PSLPS16/1364  Respondent: 15299201 / Samira Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Guildford Borough Council's draft Local Plan proposal to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:-

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in ra-running through local roads
- add to Guildford's pollution

In summary and to reiterate, I object to the above plans.

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

Attached documents:

Comment ID: PSLPS16/6717  Respondent: 15299201 / Samira Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY A26 BLACKWELL FARMI object to policy A26 Blackwell FarmThere is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly, Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly
that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with
the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more
of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.
Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt
boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on
countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in
the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road
development with access road from the A31 would also effectively cut off farm access to the south of the development
area leading to further urban influence on this countryside. The University’s stated key objective is to develop land,
which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in
future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban
land”Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its
extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey
Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green
belt plays an even greater and direct role in encouraging the more efficient usage of urban land.Stopping development on
Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and
delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student
residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking
that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely
grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of
Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the
AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be
afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and
adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for
major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development
is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development
or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public
interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would
result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much
against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will
be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development.
All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I
question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of
the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape
Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site
should be treated as though it is within the AONB during this local planning process. The access to the proposed
Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31
(Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford
from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell
Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham
Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new
development would not be able to clear the junction. In order to accommodate the volume of traffic using the new
junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and
University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather
than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact
and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport
Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic
through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill
Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a
development that would impede emergency access to an A&E department and a major incident unit. The traffic impact
resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly
assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this
work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More
significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas
of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and
Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a
supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

**Attached documents:**

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<th>pslp172/1174</th>
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<th>15299201 / Samira Abdullah</th>
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We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- 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 for Nitrous Oxide.

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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

As a detailed point connected to 3) above, we strongly object to the proposed development of Blackwell Farm would exacerbate the pre-existing congestion at peak times of the A31 and the A3, and would place unbearable pressure upon the B3000, which is already over-used for a B road.

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: pslp172/4942  Respondent: 15321249 / Ian Nicholson  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: PSLPS16/1499  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:

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

1. Blackwell distinguishes itself through powerful exceptional circumstances, much more so than the other strategic sites
2. Blackwell provides the opportunity to address a critical existing infrastructure deficit: access to the West
3. The University notes the recent Strategic Highways Assessment and points out that Blackwell offers an exceptional opportunity for sustainable transport based on a design focusing on “live here, work here” (with in excess of 10,000 people working between Blackwell and Guildford Town centre)
4. 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
5. The University believes that Blackwell provides unique long term potential and recommends that those parcels not released under this local plan be safeguarded. This would allow the Borough to better satisfy NPPF guidelines.

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

Attached documents:

Comment ID: PSLPS16/5004  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Attached documents:

Comment ID: PSLPS16/5008  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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: PSLPS16/5011  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Attached documents:

Comment ID: PSLPS16/1518  Respondent: 15327841 / Peter Jenkins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I am objecting to the proposed Blackwell Farm Estate Planning on several grounds. Besides the obvious ones of blighting the exceptionally beautiful countryside where Blackwell Farm is situated, it is also on a flood plane that becomes obvious after periods of heavy rain. The rain goes down the slopes of the Hogs Back and ends up on the fields in front of Blackwell House. Completely unsuitable for construction.

Guildford has very high employment so the Government and Council would be better of investing money in the areas where emplyment was low and growth needed. Guildford has become very much a town where the University is taking over from the residence and the town itself in its attempts for ever further expansion and the vast profit this will give them. The wishes of its residence are of no importance to them. It is only about their profits.

The Council recived over 20,000 objections from the residence of Guildford, nearly one-third of the residence of Guildford. Just how many objections does it take for the Council to bother to listen to its residence? It is clear that the influence of the University over-rides the wishes and common sence of its residence.

However, the most serious problem is the roadways. Farnham Road and the Hogs back is at a standstill every morning and most evenings. The traffic down to the A31 is always extremely heavy. The thought of many hundreds, or thousands more vehicles on the Farnham Road is obsured. The road into Guildford is just one lane in each direction and more vehicles would not be pratical. With Guildford town centre reducing its access at Bridge Street, Walnut Tree Close possibly restricting access, everything would result in gridlock. Any access into the Blackwell Farm Estate should be taken from the A31 near the hospital roundabout and at Wood Street. The Hogs Back and Farnham Road cannot take even more vehicles.

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

Attached documents:

Comment ID: PSLPS16/1604  Respondent: 15341569 / Rotraud Sarker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
This is to let you know that I am seriously worried and concerned as regards GBC’s draft Local Plan proposals to build new houses on the slopes of the Hog’s Back at Blackwell Farm. This is to express my objection to the proposal which would remove 72 hectares of scenic farmland and woodland and which would increase tailbacks on the A31 and traffic congestion.

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

Attached documents:

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Comment ID: PSLPS16/1705  Respondent: 15345697 / H Markham  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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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: PSLPS16/1725  Respondent: 15347233 / Lesley Kollinsky  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:

- Destroy views from the Hog’s Back ridge0 a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

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

Attached documents:

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Comment ID: PSLPS16/1726  Respondent: 15347297 / Margaret Carol Watts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Guildford Borough Council’s draft Local Plan Proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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

Attached documents:

Comment ID:  PSLPS16/1734  Respondent: 15347617 / Margaret Arnie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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:  PSLPS16/1752  Respondent: 15348065 / Lorraine Gould  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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- Add to Guildford’s pollution.

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

Attached documents:
I strongly object to Guildford Borough Council's draft to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm.

It will destroy the beautiful views, remove scenic farm land and increase tailbacks on the A31. Plus increase pollution due to increased traffic.

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

Attached documents:

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Comment ID: PSLPS16/1770  
**Respondent:** 15348417 / Carol Gaunt  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1787  
**Respondent:** 15348769 / Irena Padol  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/1822  Respondent: 15350113 / Caroline Birch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1830  Respondent: 15350465 / Shirley Dicker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I have been a Guildford resident for almost thirty years, some of those in Ripley which I loved, and the remainder in Merrow and I am horrified at the revised plans to merge the villages along the A3 and the Hogs Back into one large housing estate. Apart from anything else, the A3 is already often gridlocked and any loss of the greenbelt would completely destroy the land surrounding Guildford forever.

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

Attached documents:

Comment ID: pslp172/639  Respondent: 15352417 / Bernard Parke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: pslp172/3340  Respondent: 15352417 / Bernard Parke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

As a resident in this area I am greatly concerned over the impact not only here on our green belt, but on the constant traffic congestion that we experience on the A31 one which is a through road leading to the A281.

The A3 also experiences not only congestion but seems to have a frequency of RTAs.

We do not have the infrastructure to support this proposal which certainly not solve our need to provide “affordable” housing.

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

Attached documents:

Comment ID: PSLPS16/1871  Respondent: 15352929 / Prableen Sethi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: pslp172/795  Respondent: 15353697 / Ruth Palmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/1885  Respondent: 15353857 / Carolyn Lucas  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1893  Respondent: 15354241 / Sonja Molloy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: pslp172/1051  Respondent: 15354241 / Sonja Molloy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: PSLPS16/1895  Respondent: 15354305 / Ben Webb  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/1899  Respondent: 15354369 / Janet REQEMOREL Agent:

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Attached documents:

Comment ID: PSLPS16/1901  Respondent: 15354529 / S. Burton Agent:

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Attached documents:

Comment ID: PSLPS16/1908  Respondent: 15354721 / N Howers  Agent:

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Attached documents:

Comment ID: PSLPS16/1912  Respondent: 15354913 / Jenny Allan  Agent:

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• Add to Guildford’s pollution

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Attached documents:

Comment ID: PSLPS16/1959  Respondent: 15357313 / Dawn Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/1963  Respondent: 15357473 / Lynne Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: pslp172/964  Respondent: 15357473 / Lynne Turner  Agent:

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Attached documents:

Comment ID: PSLPS16/1965   Respondent: 15357665 / Paul Robert Spanton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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- Result in rat-running through local roads
- Add to Guildford’s pollution

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

Attached documents:

Comment ID: PSLPS16/1967   Respondent: 15357729 / N Hams   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1971  Respondent: 15357793 / Mary Braybrode  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1973  Respondent: 15357857 / S. Bradley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1976</th>
<th>Respondent: 15357953 / Rosemary Pert</th>
<th>Agent:</th>
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<th>Comment ID: PSLPS16/1980</th>
<th>Respondent: 15358049 / Peter Walls</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1981  Respondent: 15358113 / Nicola Matthews  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/1982  Respondent: 15358145 / Simon Stevenson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

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In summary and to reiterate, I object to the above plans.

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

Attached documents:

Comment ID: pslp172/1171  Respondent: 15358145 / Simon Stevenson  Agent:
We 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 sites 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
• 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 for Nitrous Oxide.

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Attached documents:

Comment ID: pslp172/438  Respondent: 15358337 / David Langley  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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: PSLPS16/1992  Respondent: 15358369 / Jane Fallon  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<th><strong>Respondent:</strong> 15358529 / Martin Hester</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: PSLPS16/2012  Respondent: 15358721 / Gill Haworth  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/2013  Respondent: 15358785 / Barbara Kent  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Comment ID: PSLPS16/2017  Respondent: 15358817 / Lin Rose  Agent:

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Attached documents:

Comment ID: PSLPS16/2018  Respondent: 15358881 / Caroline Hesmondhalgh  Agent:

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I object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, on the following grounds:

• It will destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
• It will remove 72 hectares of scenic farmland and additional ancient woodland from the Green Belt – a protected area
• It will undoubtedly increase tailbacks on the A31 and traffic congestion
• It will result in rat-running through local roads and increase traffic flows through local villages
Please accept this email as my signed objection to the proposals.

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

Attached documents:

Comment ID: PSLPS16/2019  Respondent: 15358945 / Ian Rose  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: PSLPS16/2023  Respondent: 15359041 / Bridget Deans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/2025  Respondent: 15359073 / Debra Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Attached documents:

Comment ID: PSLPS16/2026  Respondent: 15359169 / Peter Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/2028  Respondent: 15359265 / Rebecca Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/2032  Respondent: 15359361 / S.A. Newell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Attached documents:

Comment ID: PSLPS16/2033  Respondent: 15359393 / Pauline Ekins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Attached documents:

Comment ID: PSLPS16/2034  Respondent: 15359489 / David Cave  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Comment ID: PSLPS16/2036  Respondent: 15359617 / A. Workman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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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: PSLPS16/2037  Respondent: 15359713 / D Catchpole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: 15360289 / Jean Kent Wallace</th>
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<th>Comment ID: PSLPS16/4403</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Blackwell Farm being included in the Plan (Policy A26) because:

- it is situated entirely within the Green Belt
- more people objected at the previous consultation to the inclusion of this site than any other and the Council has clearly failed to listen
- an independent consultant has very recently declared the site as being “of AONB quality”. On this basis, it should be excluded.
- traffic problems resulting from this development would be detrimental to the whole area.

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

**Attached documents:**

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Comment ID: pslp172/5031  Respondent: 15360321 / Jean Miller  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- 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]
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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: PSLPS16/2069  Respondent: 15360385 / Janet Humairies  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: pslp172/5042  Respondent: 15360705 / Angela Harms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: PSLPS16/2082  Respondent: 15360737 / John Nottall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Section page number 493 of 941
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2083  Respondent: 15360801 / John Robert Boff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Attached documents:

Comment ID: PSLPS16/2084  Respondent: 15360929 / Ruth Townsend  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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Attached documents:

Comment ID: PSLPS16/2085  Respondent: 15361025 / Stephen Mortimer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Section page number  Page 494 of 941   Document page number  495
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Comment ID: PSLPS16/2089  Respondent: 15361217 / Michael Jeffery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: pslp172/1128  Respondent: 15361217 / Michael Jeffery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: PSLPS16/2090  Respondent: 15361313 / Carol Tunnell  Agent:
Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Comment ID: PSLPS16/2091  Respondent: 15361345 / Jim Carter  Agent:

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Attached documents:

Comment ID: PSLPS16/2092  Respondent: 15361377 / Maureen Butler  Agent:

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Attached documents:
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Attached documents:

Comment ID: pslp172/974  Respondent: 15361377 / Maureen Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: PSLPS16/2093  Respondent: 15361409 / Charlotte Ayshford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Comment ID: PSLPS16/2094  Respondent: 15361569 / Andrea Bradley  Agent:
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I am writing to you to OBJECT to policy A26 (Blackwell Farm) for the following reasons -

Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1) 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]

2) 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

3) 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]

4) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide [Policy A26].

Please understand and the strong feeling in the surrounding communities that this development is not wanted nor needed.
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park ad a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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Attached documents:
| Comment ID:  | PSLPS16/2102 | Respondent:  | 15365121 / Vitahlbhai Patel | Agent: |
|-------------|--------------|--------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 |
| 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:  | PSLPS16/2103 | Respondent:  | 15365153 / Anne Olisen | Agent: |
|--------------|--------------|--------------|------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 |
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| Comment ID:  | PSLPS16/2106 | Respondent:  | 15365313 / David Chandler | Agent: |
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<th>Respondent: 15365857 / Andrew Myers</th>
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<th>Comment ID: PSLPS16/2121</th>
<th>Respondent: 15365953 / J.K. Coghill</th>
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Comment ID: PSLPS16/2123  Respondent: 15366081 / Anne Human  Agent:

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Comment ID: PSLPS16/2124  Respondent: 15366145 / A Shaw  Agent:

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Comment ID: PSLPS16/2328  Respondent: 15385505 / Sam Cansell  Agent:

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Comment ID: PSLPS16/2329  Respondent: 15385537 / Gerald R S Norris  Agent:

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<th>15388193 / Isobel Dearnley</th>
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Policy A26 (Blackwell Farm)
I am writing to object strongly to the above policy in the Guildford Local Plan. There are many reasons why this Policy is unsuitable (pollution, loss of countryside and many more) and these have been discussed over many years but my main objections are as follows.

Land was removed from the Green Belt 15 years ago at Manor Park to allow expansion of the University but the University has failed to build on this land with only one third of the planned university residences being built since then. The University states that it is playing its part in addressing the housing need in Guildford but the 1,800 houses being planned for the site at Blackwell Farm will not provide the affordable housing Guildford needs.

There are no grounds for yet more Green Belt land being taken under "exceptional circumstances" with this obligation of the University still outstanding. I agree with the CPRE who have stated that by delivering more student housing on its existing campuses, the University would free up more than 1,000 affordable homes in the town centre for key workers and their families. The University should also increase the density of buildings and offices on its neighbouring Surrey Research Park, rather than seek to harm some of the best countryside in the area.
Equally important is the proposed access road from the A31 Hogs Back to the hospital roundabout at Egerton Road, with a large junction with roundabout and signal lights at the entrance to Down Place, at the top of Down Lane. It is a fact that the traffic along this stretch of the A31 westbound before it joins the A3 is already at breaking point. Queues build up throughout the day and the slightest incident on the A3 or in Guildford itself causes total chaos. The thought of another 1,800 home owners, with probably twice that number of cars, accessing this major artery at all times of the day and night does not bear thinking about. The development at Blackwell Farm is entirely inappropriate, unnecessary, harmful and will cause untold damage and disruption not just while it is being built but will only get worse in the future.

I urge you to listen to the valid points being made by everyone who has an interest in preserving our countryside and who has access to the road network which will be affected, becoming increasingly worse in the years to come.

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• result in rat-running through local roads
• add to Guildford's pollution.

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| Comment ID: | PSLPS16/2629  Respondent: 15411745 / Sarah Baskerville  Agent: |
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| Comment ID: | pslp172/1176  Respondent: 15411745 / Sarah Baskerville  Agent: |
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| Comment ID: | pslp172/1740  Respondent: 15411745 / Sarah Baskerville  Agent: |
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Comment ID: PSLPS16/2713  Respondent: 15421281 / Michael Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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We object to Guildford Borough Council's draft Local Plan proposals 10 build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green bell
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/2714  Respondent: 15421345 / Penelope Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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I'm very concerned about the proposal to build

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

We object to 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 sites 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
- 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 for Nitrous Oxide.

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

**Attached documents:**

---

Comment ID: PSLPS16/2721  **Respondent:** 15421537 / Jane Brazil  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

**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: pslp172/198  **Respondent:** 15421537 / Jane Brazil  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: PSLPS16/2722  Respondent: 15421569 / Richard Ker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Attached documents:

Comment ID: PSLPS16/2724  Respondent: 15421665 / Betty Hutson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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<tr>
<th>Comment ID: PSLPS16/2775</th>
<th><strong>Respondent:</strong> 15423137 / Susan Balsdon</th>
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<th>Comment ID: PSLPS16/2986</th>
<th><strong>Respondent:</strong> 15432897 / Michael Joule</th>
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<tr>
<td>I object on so many levels, all have been well documented by others, but most particularly on the scant regard given by both Unis and SCC Highways in mitigating the impact of traffic increase on both A31 Hogs Back and the A3 by-pass. The University have consistently falsified their own projections on traffic increase and will continue to do so if this development goes ahead. Since the initial development of Manor Farm they have denied any increase in traffic above some minimal and notional percentage to Egerton Road, despite the recent vast redesign of the junction with Manor Farm and continuing increase in traffic volume since. With the addition of the Sports Centre, The Park and Ride and now the Veterinary Centre, Unis claim there has been no increase in traffic volume, how can they be believed on any future</td>
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projections supporting their own development. Any future increases to this road system will have profound implications on the RSCH access and represents a significant danger in emergencies, all of which appear to be given scant regard in the pursuit of their own and GBC's financial gain. Why cannot they fulfil their own quota of accommodation build for which they already have planning consent? Or are they a special case to be treated differently from individuals or less influential bodies? I thought we lived in a democratic society.

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: PSLPS16/3020</th>
<th>Respondent: 15433633 / Mike Allcock</th>
<th>Agent:</th>
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A26 BLACKWELL FARM

Transport and environmental issues:

- Traffic: Significant traffic issues which bring into question the timing of commencement of development
- Rail: Requirement to contribute to network rail. I sense this can take many years to agree and implement
- *location: The location is not bordering to the town
- There are flooding issues
- Boundaries require sensitive design and are not consistent with government policy of ensuring that any boundary changes to the green belt will have a degree of permanency.

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: PSLPS16/3057</th>
<th>Respondent: 15434561 / Susan Frost</th>
<th>Agent:</th>
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We object to Guildford Borough Councils draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hogs Back at Blackwell Farm which will:

- destroy views from the Hogs Back ridge - a nationally designated Area of Outstanding Natural Beauty.
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt.
- increase tailbacks on the A31 and traffic congestion.
- result in rat running through local roads.
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I wish to object about the draft plans to develop a huge number of houses plus an industrial park on the site of Blackwell Farm on the Hogs Back. Views from the Hogs Back, an AONB, will be destroyed and a large area of farmland will be lost. In addition, extra traffic that such a development would be bound to create, would cause increased traffic queues on the A31, a road already blighted with very lengthy tailbacks especially at peak times.

Sirs, I beg you to reconsider, and reject, this truly unacceptable development.

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: PSLPS16/3222  Respondent: 15442433 / John Morley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

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Comment ID: PSLPS16/3223  Respondent: 15442465 / Shova Sharma  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We oppose to Plan proposal to build 1,800 houses, an industrial Park and S highway on the slopes of the How's Back at 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: PSLPS16/3487  Respondent: 15451489 / K Shipton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will,

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

Attached documents:

Comment ID: PSLPS16/3531  Respondent: 15453889 / Teresa Van Den Bosch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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- Add to Guildford’s pollution.

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Attached documents:

Comment ID: PSLPS16/3532  Respondent: 15453921 / Anne Willem  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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I object in the strongest possible terms to the expansion of Guildford as represented by this local plan.

I object to development within the green belt and in sight of the AONB.

I object to the proposed development at site A26 Blackwell farm where an independent landscape evaluation study (funded by Compton, Worplesdon and Wanborough Parish Councils) has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). The study will now be forwarded to Surrey CC/ Natural England with a request that Blackwell Farm is included as a candidate area in the forthcoming AONB boundary review. The PCs were prompted to do this when it was brought to their attention that Blackwell Farm had been omitted from Surrey CC’s landscape evaluation on behalf of Surrey Hills AONB Board (despite a previous study suggesting that it was likely to meet AONB criteria and merited assessment)

**Transport survey for A26 Blackwell Farm.**

Compton PC and Compton Village Association have jointly commissioned a Technical Note by traffic consultant RGP to look at the implications of the Blackwell Farm development, and the proposed new link road from the A31. The results show:

- The road infrastructure costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) are far in excess of what has been estimated in the Local Plan and would not justify a development of this size. The scheme is therefore economically unviable.
- The new 4-way junction proposed at Down Place on the A31 would require more land-take than the Local Plan has suggested - it would involve widening the A31 bridge over the A3. No money has been allocated for this bridge-widening scheme and there is no indication that Highways England has approved it. Given the traffic flows, it is more likely that a large roundabout would be needed at this junction and this would severely impact the Surrey Hills Area of Outstanding Natural Beauty.
- The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital.
- All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (e.g. Puttenham Interchange). No transport infrastructure requirements for the site have been identified to address the u-turning problem on the A31 (although we know SCC is trying to close the East Flexford gap).

I object to the proposed development at Slyfield which omits to show improved road systems and would lead to traffic gridlock.

The full consequences of the proposed local plan are enormous and are only now emerging. For example, even if all the proposed highway improvements in the Plan were built, congestion would not improve. We would just have a lot more...
people stuck in traffic and traffic would get a very great deal worse to start with. In our area, Stoke next Guildford changes we would be likely to experience include:

° the expansion of Guildford along the A3. Development of 2000 homes on Gosden Hill, by Burpham, is a particular local concern
° more traffic from the major development sites coming in on the Stoke Intersection and London Roads
° roads near us, such as Stoke Rd, and York Road, being even busier due to other more central routes being closed to through traffic, pedestrianised or used for development
° pressure for high density development eroding character in our area

It is a matter of choice by our Council that Guildford would expand on this scale. Many residents were prepared to support our Council in the need for some sensitive, measured expansion. However the scale of what is proposed is far from this.

Other Councils are applying “constraints” to their overall housing number. This is allowed. By contrast, Guildford is proposing to release so much land for development that we could end up being asked to meet housing need for neighbouring towns. We find ourselves in the bizarre situation where it is suggested we sacrifice our countryside in order to protect countryside around Woking.

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28. Policy A26 Blackwell Farm

The addition of a six form entry secondary school will add to morning peak hour traffic demand on a road system that will be under pressure.

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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:

Comment ID: PSLPS16/3845  Respondent: 15461793 / Paul Smith  Agent:

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

I object in the strongest possible terms to the expansion of Guildford as represented by this local plan.

I object to development within the green belt and in sight of the area of outstanding beauty.

I object to the proposed development at site A26 Blackwell farm where an independent landscape evaluation study (funded by Compton, Worplesdon and Wanborough Parish Councils) has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). The study will now be forwarded to Surrey CC/Natural England with a request that Blackwell Farm is included as a candidate area in the forthcoming AONB boundary review. The PCs were prompted to do this when it was brought to their attention that Blackwell Farm had been omitted from Surrey CC’s landscape evaluation on behalf of Surrey Hills AONB Board (despite a previous study suggesting that it was likely to meet AONB criteria and merited assessment)

Transport survey for A26 Blackwell Farm.

Compton PC and Compton Village Association have jointly commissioned a Technical Note by traffic consultant RGP to look at the implications of the Blackwell Farm development, and the proposed new link road from the A31. The results show:

- The road infrastructure costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) are far in excess of what has been estimated in the Local Plan and would not justify a development of this size. The scheme is therefore economically unviable.
- The new 4-way junction proposed at Down Place on the A31 would require more land-take than the Local Plan has suggested - it would involve widening the A31 bridge over the A3. No money has been allocated for this bridge-widening scheme and there is no indication that Highways England has approved it. Given the traffic flows, it is more likely that a large roundabout would be needed at this junction and this would severely impact the Surrey Hills Area of Outstanding Natural Beauty.
- The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital
- All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (eg Puttenham Interchange). No transport infrastructure requirements for the site have been identified to address the u-turning problem on the A31 (although we know SCC is trying to close the East Flexford gap).
I object to the proposed development at Slyfield which omits to show improved road systems and would lead to traffic gridlock.

The full consequences of the proposed local plan are enormous and are only now emerging. For example, even if all the proposed highway improvements in the Plan were built, congestion would not improve. We would just have a lot more people stuck in traffic and traffic would get a very great deal worse to start with. In our area, Stoke next Guildford changes we would be likely to experience include:

- the expansion of Guildford along the A3. Development of 2000 homes on Gosden Hill, by Burpham, is a particular local concern
- more traffic from the major development sites coming in on the Stoke Intersection and London Roads
- roads near us, such as Stoke Rd, and York Road, being even busier due to other more central routes being closed to through traffic, pedestrianised or used for development
- pressure for high density development eroding character in our area

It is a matter of choice by our Council that Guildford would expand on this scale. Many residents were prepared to support our Council in the need for some sensitive, measured expansion. However the scale of what is proposed is far from this.

Other Councils are applying “constraints” to their overall housing number. This is allowed. By contrast, Guildford is proposing to release so much land for development that we could end up being asked to meet housing need for neighbouring towns. We find ourselves in the bizarre situation where it is suggested we sacrifice our countryside in order to protect countryside around Woking.

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

Attached documents:

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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
- 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 exceeds safe EU limits.

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

Attached documents:
I am sickened by the expansion of Guildford as represented by this local plan, and am objecting.

I object to development within the green belt and in sight of the AONB.

I object to the proposed development at site A26 Blackwell farm where an independent landscape evaluation study (funded by Compton, Worplesdon and Wanborough Parish Councils) has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). The study will now be forwarded to Surrey CC/Natural England with a request that Blackwell Farm is included as a candidate area in the forthcoming AONB boundary review. The PCs were prompted to do this when it was brought to their attention that Blackwell Farm had been omitted from Surrey CC’s landscape evaluation on behalf of Surrey Hills AONB Board (despite a previous study suggesting that it was likely to meet AONB criteria and merited assessment).

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- The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital.
- All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (e.g., Puttenham Interchange). No transport infrastructure requirements for the site have been identified to address the u-turning problem on the A31 (although we know SCC is trying to close the East Flexford gap).

I object to the proposed development at Slyfield which omits to show improved road systems and would lead to traffic gridlock.

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- the expansion of Guildford along the A3. Development of 2000 homes on Gosden Hill, by Burpham, is a particular local concern.
- more traffic from the major development sites coming in on the Stoke Intersection and London Roads.
- roads near us, such as Stoke Rd, and York Road, being even busier due to other more central routes being closed to through traffic, pedestrianised or used for development.
° pressure for high density development eroding character in our area

It is a matter of choice by our Council that Guildford would expand on this scale. Many residents were prepared to support our Council in the need for some sensitive, measured expansion. However the scale of what is proposed is far from this.

Other Councils are applying “constraints” to their overall housing number. This is allowed. By contrast, Guildford is proposing to release so much land for development that we could end up being asked to meet housing need for neighbouring towns. We find ourselves in the bizarre situation where it is suggested we sacrifice our countryside in order to protect countryside around Woking.

Please do not let this local plan go ahead in its present form.

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

Attached documents:

Comment ID: pslp172/3166  Respondent: 15461889 / Jasper Collinson-Warr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I also object to the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which 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. 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]. 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 exceeds safe EU limits.

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

Attached documents:

Comment ID: PSLPS16/3864  Respondent: 15462209 / Susan L Lowther  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I strongly object to the proposals for site A26 (Blackwell Farm).

For the following reasons:

1. an independent landscape evaluation study for Blackwell Farm has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). This is being ignored in the local plan
2. The effect of the proposed development on the surrounding areas.
• The road infrastructure has not been considered properly. The costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) can not justify a development of this size. The scheme would therefore be economically unviable.

• The new 4-way junction proposed at Down Place on the A31 would severely impact the Surrey Hills Area of Outstanding Natural Beauty.

• The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital. No consideration has been given for the effects of this on the surrounding area and the villages to the west of the site.

• All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (for example Puttenham Interchange).

• No consideration has been given for the effect of this development along with others at flexford/Normandy, Ash/Tongham and the aldershot area on the existing congestion along the A31/A3 with traffic approaching from the west.

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

Attached documents:

Comment ID: PSLPS16/3955  Respondent: 15466721 / Mark Andrew Alder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

• destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
• remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
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• add to Guildford's pollution.

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

Attached documents:

Comment ID: PSLPS16/3956  Respondent: 15466753 / G Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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: pslp172/4866  Respondent: 15466753 / G Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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- adds to air pollution in neighbouring areas, which already exceed 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: PSLPS16/3958  Respondent: 15466785 / Stephen Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: pslp172/872  Respondent: 15466913 / David Wright  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3965  Respondent: 15466977 / Posy Noble  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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: PSLPS16/3968  Respondent: 15467073 / Luke Romaine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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Attached documents:

Comment ID: PSLPS16/3970  Respondent: 15467137 / Simon Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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<th>Comment ID: PSLPS16/4049</th>
<th>Respondent: 15469985 / Anne Baker</th>
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<th>Respondent: 15470049 / C Carr-White</th>
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Attached documents:

Comment ID: pslp172/705   Respondent: 15470177 / M D Traynor   Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |

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Attached documents:

Comment ID: PSLPS16/4053   Respondent: 15470209 / Paul Skinner   Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 |

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

• destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty |
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• increase tailbacks on the A31 and traffic congestion |
• result in rat-running through local roads
We 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
- 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]
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- add to Guildford's pollution.

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: pslp172/4843  Respondent: 15470369  Emilie Adams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: PSLPS16/4062  Respondent: 15471521  Phillipa Chapman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- add to Guildford's pollution.
- The A31 is already dangerous and heavily congested.

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

Attached documents:

Comment ID: PSLPS16/4063  Respondent: 15471553  L Y Robert  Agent:
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- result in rat-running through local roads
- add to Guildford's pollution.

Who is running this town!!!

University has too much power!

Shame on you!

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Comment ID: PSLPS16/4065  
Respondent: 15471617 / Richard Lansdowne  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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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: PSLPS16/4066  
Respondent: 15471649 / Katarina Burgess  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Attached documents:

Comment ID: pslp172/866  Respondent: 15472865 / Anthony Pickford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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: PSLPS16/4101  Respondent: 15472929 / D Patrick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 558 of 941
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Attached documents:

Comment ID: PSLPS16/4116  Respondent: 15473313 / J M Matthews  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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: PSLPS16/4117  Respondent: 15473345 / Andrew Hampshire  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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: PSLPS16/4131  Respondent: 15473761 / Robert Drummond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals for Blackwell farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

The A31 is already a disaster due to its inability to cope with the traffic generated by local use, long distance use and the inability of the planners and authorities to build an adequate by-pass of Guildford. It has become a totally unsafe Road especially at the Eastern end of the Hogs Back due (not to its crossing points) but due to the static traffic at many times of the day backing up, due to inadequate signage, due to poor surfaces and due to the high speed drivers when it should have a 50mph limit or even less. The plans are also ignoring the likely increase of traffic from the proposed additional housing in Normandy, Ash and Aldershot. The planners are creating a situation that is turning a disaster into a nightmare by failing to consider the bigger picture. Many more lives will be lost and people injured unless plans are amended and designed to incorporate all the needs of both the local communities and the long distance travellers.

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

Attached documents:

Comment ID: PSLPS16/4140  Respondent: 15474913 / Victoria Huth  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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: PSLPS16/4191  Respondent: 15476865 / Peter Barratt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
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<th>Comment ID:</th>
<th>PSLPS16/4226</th>
<th>Respondent:</th>
<th>15478273 / Margaret Bennett</th>
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<th>15479425 / David Mitchell</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4351  Respondent: 15482305 / Jennie Horton  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  

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

As a local resident and member of the Hogs Back residents association I write to register my strong objection to Guildford's local plan site allocation A26 (Blackwell Farm). Whilst I accept the need for additional housing around Guildford I object on 3 counts:

First the new junction that will connect the site to the A31 will increase the congestion on an already very busy road. East bound traffic along the eastern end of the Hogs Back is frequently stationary for miles in the peak morning periods and any junction will only exacerbate the situation.

Secondly, having worked on the Research Park for 15 years, despite the recent work on the Egerton Road junction, the site cannot handle the volume of traffic at peak times and frequently becomes gridlocked. Further expansion will only make this worse and more frequent.

Thirdly, the site is adjacent to an Area of Outstanding Natural Beauty, and I understand it may be re-designated as part of it. As such any development will be very detrimental to the area.

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

Attached documents:

Comment ID: PSLPS16/4384  Respondent: 15482849 / B Burgess  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26  

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

1. The University of Surrey has already desecrated Manor Farm by building on land originally designated as Green Belt. The Green Belt status was removed due to the University advancing the argument their "Special Circumstances" as an educational organisation needing more accommodation for its students, etc. It has not built accommodation for 1,500 students for which it has planning permission but instead pursued its "for profit" ventures on the site.

After building an under-used Park & Ride, an International Sports Centre and Veterinary School the University has still not built 1,500 student houses on Manor Park for which it has planning permission. Instead students occupy over 1500 houses in the area and in Guildford town which could be available for local residents, students add to traffic and parking issues for local residents.
Instead of fulfilling the already approved planning for student houses on Manor Farm, more student houses were built on the former Unigate Dairiesite which is close to Guildford Station. This provision for students has denied local residents who work in Guildford town or further afield the opportunity of walking to work or to the train or bus station thus reducing pollution from vehicle emissions and reducing vehicle movements. This property alone could have provided housing for several local residents and their families.

The University's proposed development on Blackwell Farm will further erode Green Belt and affect the visual amenity of the Hog's Back Area of Outstanding Natural Beauty. A ministerial statement is clear that constraints such as Green Belt, AONB, etc. must be considered. The following Government on Green Belt Guidance announcement stated:

“The framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse Impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and or designated as sites of special scientific interest; land designated as greenbelt, local green space, an area of outstanding natural beauty, heritage coast or with a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion”.

The adverse impacts of the University building such a large development on Blackwell Farm in terms of harm to the Green Belt and AONB demonstrably outweighs the benefits of providing land for housing and employment. Much of the Blackwell Farm development is a profit making exercise, like Manor Farm where the Farm was purchased by the University with Green Belt restrictions; the University then used its might and influence to have that restriction removed.

In addition:

- Blackwell Farm is still an agricultural farm providing valuable crops without the need to incur costs of importing this food e.g. 1 acre of land can produce up to 2.5 tonnes of wheat, etc.;

- The University has already made plans to develop Blackwell Farm by restricting public access to recreation on their land of the public footpaths and bridleways. What action has been taken to reinstate access when the University is breaking the law?

- If the University is allowed to build on Blackwell Farm we will all lose the visual amenity of this Area of Outstanding Natural Beauty and Green Belt forever; the setting will be urbanised.

- The development will create intense areas of light pollution, not only from the numbers of houses but from the University's security for the additional Research Park units they Intend to build.

- The retail units they intend to build will further affect small local shops.

- The development will be in an area totally disassociated from Guildford Town, and any new residents on Blackwell Park will naturally travel into Guildford household needs, adding to any already congested traffic system.

- There will be extra demands on public services, including the Royal Surrey County Hospital; increased traffic congestion will impede safe passage and increase and affect response times for ambulances attending the Royal Surrey County Hospital.

- Pollution from vehicles and central heating systems will affect the environment around the proposed Blackwell Farm development.

1. Included in the major significant factors to OPPOSE the University's plan to develop on Blackwell Farm. Is the lack of immediate improvements to the Infrastructure. Before any large developments are considered, infrastructure must come first; it is already overstretched.

The traffic along the A31 Hog's Back is already at stand still at peak hours.
The University's plan for Blackwell Farm is to include new schools in the development. This will further increase the volume of traffic at peak times.

No provision has been made for cycle tracks along the A31 which could provide a safe Route for environmentally minded members of the public to cycle to the Surrey Research Park/Hospital, etc. from Farnham to Guildford and Guildford to Farnham.

There are plans to build more houses between Normandy and Flexford and in Frog Grove lane at the proposed SANG site. Additional traffic from these developments from the West is likely to add to the congestion on the A31 and the A3 and rat runs through local roads and lanes.

There is no mention of the provision of slip roads for safe access for house holders living on each side of the Hog's Back. How are we supposed to safely enter/exit this highway during the hours when traffic is moving at motorway speeds? With the additional traffic volumes that will be generated, it will be untenable.

There is no mention of provision of safe access for pedestrians who cross the A31 to the bus stop and walkers using the public footpaths which cross the A31 Hog's Back.

We note that an air pollution survey was carried out at the top of East Flexford lane/A31 earlier this year (presumably at the University's behest). If the statistics are used to countermand complaints about in increase of air pollution they should be taken in the context of the increase in traffic that a development at Blackwell Farm will generate; also in the winter we see and smell the emissions from vehicles in the "A31 Car Park" in the mornings rolling off the Hog's Back into the fields, into Blackwell Farm and surrounding properties along the Hog's Back. Building on this Green Belt area will remove Green lungs which counteract the effects of traffic pollution.

There is frequent badger roadkill on the Hog's Back.

The additional traffic will create even more noise disturbance from the Hog's Back for wildlife.

The proposed traffic light system at the top of the Farnham Road/Down Place will create more of a back-log along the A31; queues at peak times already extend westwards beyond the B3000. How is the traffic joining from new housing in Normandy/Flexford and the SANG at Frog Grove lane going to join the A31?

Drivers impatient to reach the A3 already drive along the fast lane and "cut in" just before the slip road onto the A3. This is the cause of accidents and "shunts" which have inappropriately been attributed to the gap in the central reservation in the A31 at the East Flexford lane and Monks Hatch junction. The sec Highways state, as a safety measure, "Queues Ahead" signs have been erected before the A3 sliproad on the A31. However, these are only just beyond the Junction at East Flexford lane, just before the A3 sliproad. By the time drivers reach these signs, they are already IN the queue at peak times.

Should the University's plans for Blackwell Farm be approved the benefits of income from Community infrastructure Levy contributions are likely to be absorbed by making provision of another SANG instead of improving the already overloaded and congested infrastructure around Guildford.

The appalling congestion around and into and out of Guildford must cost businesses dearly.

Approving planning for this huge development on Blackwell Farm is ill-conceived and only serves to put more money into the University's and others coffers and not benefit Guildford in the many respects I have referred to in this letter.

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

Attached documents:
I am writing to voice my objection to the proposed building of homes on Blackwell Farm, Guildford on land that has always been an area of outstanding natural beauty. How come it has suddenly been reclassified just because you want homes built on it?

The resultant extra traffic and pollution in the area would be appalling. Medical evidence is clear on the effect of car pollution on the human body. Each home would have at least two cars - you do the maths. The area is a nightmare now, imagine what it would be like after the homes are built!

Leave the green fields as they are, we need green spaces. You cannot build over every bit of our countryside.

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

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial and a highway on the slopes of the Hog's Back at Blackwell Farm which will:

- destroy views from the Hog's Back ridge - a nationally designate Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the Green Belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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: PSLPS16/4656</th>
<th>Respondent: 15494945 / Simone Wilkins</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strongly to the above proposed development. I do not believe that it is for the good of Guildford in any shape or form. We do not have the necessary infrastructure to support it nor is anything satisfactory proposed. With the current levels of traffic on the hogs back, the level of accidents along this section of the A3 with no safe place for emergency vehicles and close proximity to the hospital thus endangering the lives of many people with gridlocked traffic, the whole proposal is pure madness. I am shocked that it has got as far as it has. Not to mention this is an area of outstanding beauty and greenbelt!!

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

Attached documents:

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</tbody>
</table>

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

I object to the above proposed development for the following reasons:

Policy A26-para 4.1.9:

1) This has been classed as an Area of Outstanding Beauty in the past but this has been conveniently disregarded in order to allow developments to take place on this land. I'm not sure what's changed?

2) Office space proposed in the current development will further increase traffic on the A3 at peak times.
3) Ignores current infrastructure problems as highlighted by independent study on the traffic and seems to want to add further to them. This could prove very dangerous around the Royal Surrey Hospital. Also due to the fact there is no hard shoulder the police/ emergency service have no where to pull over resulting in the A3 having to come to a complete halt causing gridlock chaos.

4) Air pollution already exceeds EU limits for Nitrous Oxide.

As a resident of Beechcroft Drive already struggling to enter and exit via the A3 due to increased traffic with a young baby and after also suffering a stroke 2 weeks after giving birth, I'm appalled that we are being left until there is a serious accident on this junction before anything is done. I can assure you that if anything happens to me and my child on this junction I will ensure that my family make sure it is on the front on every national newspaper. This proposed development is going to make a difficult junction even harder. Drivers do not keep to the 50mph limit and it's just a matter of time before there is a fatality. Please don't add to an already dangerous situation.

With the widening of the A3 a real possibility from 2020, we need to address the infrastructure before we gridlock Guildford with new developments in this section of Guildford.

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

**Attached documents:**

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Comment ID: pslp172/525  Respondent: 15494945 / Simone Wilkins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

**Attached documents:**

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Comment ID: PSLPS16/4688  Respondent: 15495169 / Joseph Clarke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to express my extreme concern over the plans for development on site A26 (Blackwell Farm).

Having lived in the area my whole life, I cannot stress enough the strength of my objection to these plans.

This area of outstanding natural beauty deserves to be protected.

The increase in traffic this would cause, resulting in a huge increase in both noise and air pollution, along with the excess land required to sustain the new road infrastructure are just some of the immensely damaging and irreversible consequences of this poorly thought out plan.

I hope you understand the importance of what is at stake here, and I stress again my sincere objection to these plans.

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

Attached documents:
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: PSLPS16/5105  Respondent: 15502433 / Jill Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I OBJECT to the proposals for Blackwell Farm because they breach the Green Belt, the housing numbers are excessive, damage would be caused to the Surrey Hills AONB and excessive extra traffic would be inflicted on Send.

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

Attached documents:

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Comment ID: PSLPS16/5305  Respondent: 15505089 / Richard Horton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

As a local resident and member of the Hogs Back residents association I write to register my strong objection to Guildford’s local plan site allocation A26 (Blackwell Farm). Whilst I accept the need for additional housing around Guildford I object on 2 counts:

First the new junction that will connect the site to the A31 will increase the congestion on an already very busy road. East bound traffic along the eastern end of the Hogs Back is frequently stationary for miles in the peak morning periods and any junction will only exacerbate the situation.

Second, the site is adjacent to an Area of Outstanding Natural Beauty, and I understand it may be re-designated as part of it. As such any development will be very detrimental to the area.

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

Attached documents:
Comment ID: PSLPS16/5357  Respondent: 15505825 / Liane Jarman  Agent:

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

I object to the building of thousands of homes and the business park on Blackwell Farm in particular.

Reasons stated below:

Guildford can't cope with the current traffic. To add more vehicles to the congested and often gridlocked roads is ridiculous. It's not just at rush hour - it's bad at the weekends too.

The South East does not have enough water. How are we going to supply an extra 2000 homes?

I don't believe the sewerage infrastructure will cope well either. The climate is changing. There will be more flooding. Fields soak rainwater up. Housing estates don't.

I live in Guildford and I've just had to wait 21 days to see a GP. Who's going to look after the thousands of new residents?

No one wants more pollution - air quality will get worse leading to more health problems. More noise from all the additional traffic and more light pollution.

I walk past Blackwell Farm everyday. I see deer, skylarks, buzzards, kites, shrews and butterflies everyday. Where will they go if we destroy their habitat? There are orchids too, and a myriad of plants and insects.

I also walk the ancient woodland? It's beautiful and peaceful. The new proposed road from the Surrey Research Park, Gill Avenue to the new estate will cut through the important Woodland which was the original, defensible Green Belt boundary.

I object to the Surrey Research Park expansion. There are empty office blocks all over Guildford. More traffic. More lorries. No thanks.

All of the land earmarked is either an Area of Outstanding Natural Beauty, Area of Great Landscape Value or Greenbelt and should be protected by law. Lose it and it's gone forever. Unimportant to the greedy developers. Devastating to Guildford residents.

Guildford was lovely when I moved here 10 years ago. It's not so nice now. I won't stay if this plan goes ahead.

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

Attached documents:

Comment ID: pslp172/3816  Respondent: 15505825 / Liane Jarman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the building of nearly 2000 homes and the business park on Blackwell Farm in particular.

Reasons stated below:

Guildford can't cope with the current traffic. To add more vehicles to the congested and often gridlocked roads is ridiculous. It's not just at rush hour - it's bad at the weekends too.

The South East does not have enough water. How are we going to supply an extra 2000 homes?

I don't believe the sewerage infrastructure will cope well either. The climate is changing. There will be more flooding. Fields soak rainwater up. Housing estates don't.

I live in Guildford and I've just had to wait 21 days to see a GP. Who's going to look after the thousands of new residents?

No one wants more pollution - air quality will get worse leading to more health problems. More noise from all the additional traffic and more light pollution.

I walk past Blackwell Farm everyday. I see deer, skylarks, buzzards, kites, shrews and butterflies everyday. Where will they go if we destroy their habitat? There are orchids too, and a myriad of plants and insects.

I also walk the ancient woodland? It's beautiful and peaceful. The new proposed road from the Surrey Research Park, Gill Avenue to the new estate will cut through the important Woodland which was the original, defensible Green Belt boundary.

I object to the Surrey Research Park expansion. There are empty office blocks all over Guildford. More traffic. More lorries. No thanks.

All of the land earmarked is either an Area of Outstanding Natural Beauty, Area of Great Landscape Value or Greenbelt and should be protected by law. Lose it and it's gone forever. Unimportant to the greedy developers. Devastating to Guildford residents.

Guildford was lovely when I moved here 10 years ago. It's not so nice now. I won't stay if this plan goes ahead.

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

Attached documents:
landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF?

Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

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

Attached documents:

Comment ID: PSLPS16/5641  Respondent: 15568065 / Colin and Susan Lewis  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to the new local plan which will destroy extensive AONB by invading greenfield sites.

In particular we have doubts about the sustainability of of the proposed development off the Hogs Back at Blackwell Farm.

This would destroy views from the Hogs Back ridge, Remove 72 hectares of scenic farmland and ancient woodland, Add 1800 houses, an Industrial Park, traveller's pitches, and a new highway, Increase traffic congestion along the A31, A3, and the B3000 through Compton village, And add to Guildford's pollution.

Don't let this happen.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1921  **Respondent:** 15568065 / Colin and Susan Lewis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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 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?

Attached documents:

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**Comment ID:** pslp172/11  **Respondent:** 15568929 / Elizabeth Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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I am writing to object to the Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]. My objections are:

1) 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]

2) 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

3) 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]
4) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide [Policy A26].

5) The proposed link road from the A31 to the new site passes through historic & AONB land, this traffic route seems unviable.

6) The housing need seems unsubstantiated, A review of the Strategic Housing Market Assessment commissioned by Guildford Residents Association has identified a flaw in the way that the housing need figure has been calculated, this needs to be reviewed prior to any sites being allocated.

Furthermore I wish to object to the removal of SRN6 offering a safe access to Beechcroft Drive, currently studies show this as a dangerous junction and offering no resolution to the residents in the local plan is unacceptable.

**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 a new junction for Blackwell Farm development at the top of the Farnham Road, together with traffic generated by 8,000 new homes along the Hog's Back A31 corridor, causing massive congestion.

I object to a new road for the Blackwell Farm development carved through the Surrey Hills Area of Outstanding Natural Beauty and through ancient woodland from A31 to Egerton Road causing gridlock on the A3 and West Guildford.

I object to views of the Surrey Hills Area of Outstanding Natural Beauty blighted by a 1,800 home development, extended Industrial Park, supermarket and travellers pitches at Blackwell Farm at the foot of the Hog's back.

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

Attached documents:

Comment ID: PSLPS16/5699  Respondent: 15571041 / William Cardiff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to any A31/Blackwell development An outrageous misuse of green belt

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

Attached documents:

Comment ID: PSLPS16/5784  Respondent: 15574369 / Alan Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am opposed to the building of 1,800 houses on the hogs back yours a jones Sent using the mail.com mail app

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

Attached documents:

Comment ID: PSLPS16/5840  Respondent: 15575489 / Simon Bond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am opposed to the building of 1,800 houses on the hogs back yours a jones Sent using the mail.com mail app

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

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SETsquared's Surrey Centre in is based on the Surrey Research Park as a branch of an organisation owned by a consortium of universities. It is supported by the Department of Business Innovation Science and the Higher Education Innovation Fund.

Its role is to contribute towards the formation and development of technology based start-up companies. It has been benchmarked globally and recognised as one of the world's leading university based business incubator by the UBI Global Index which reviewed 1200 such incubators.

I am writing to you as the CEO of SETsquared in the context of the Guildford Local Plan which is out for consultation.

We have around 70 members under incubation. They benefit from being on the Surrey Research Park because of the opportunity for physical growth, on-site proximity to the university and the opportunity for recruitment and retention of talented staff to build their companies with.

I understand that the consultation draft of the local plan includes policies to support the development of housing, it includes provision for investment in infrastructure and it has an allocation for extending the Surrey Research Park.

Given the role of SETsquared in supporting economic growth I am writing to support the policies in the Draft Local Plan that include alteration to the green belt boundary that will provide for the policies that meet these ambitions.

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

Attached documents:

Comment ID: PSLPS16/6589  Respondent: 15579009 / Patricia Lines  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the proposed signalised junction of A31 and Down Place and its use as the main vehicular access for the Blackwell Farm housing development.

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

Attached documents:

Comment ID: PSLPS16/6190  Respondent: 15585697 / Florence Clarke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to state that I strongly object to the site allocation A26, Blackwell Farm being put forward for housing development.

As of an area of Outstanding Natural Beauty and a green belt it is madness that such a plot should be put forward for development when there are numerous brown field sites, derelict buildings and wastelands to build upon in the area. Until these options are exhausted, building on green field sites should not even be an option.

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 inclusion of Blackwell Farm in the plan and would like to attend the examination.

I object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
- Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in ‘Guildford urban area’ and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

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 A26 BLACKWELL FARM

I object to policy A26 Blackwell Farm.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - ‘checking the unrestricted sprawl of large built-up areas’. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 ‘assists in safeguarding the countryside from encroachment’ - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - ‘assists in urban regeneration by encouraging the recycling of derelict and other urban land’.

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, ‘The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB’. I question how the
The proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF?

Finally, nearly the whole site has been identified as a 'candidate area' for AONB status in the Landscape Evaluation Study commissioned by Compton, Worpleston and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion ‘hot spots’: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should ‘identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15’. In a footnote to this, it further adds, ‘To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.’ I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be ‘viably developed’.

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

**Attached documents:**
result in rat-running through local roads add to Guildford's pollution

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

Attached documents:

Comment ID: PSLPS16/6300  Respondent: 15588545 / J & J Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I would like to be able to object against the 1,8000 houses and an industrial estate being built up on the slopes of the Hog’s back.

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

Attached documents:

Comment ID: PSLPS16/6301  Respondent: 15588577 / Sue Hurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I would like to put an objection in against 1,8000 houses being built, an industrial park and a highway on the slopes of the Hog’s back at Blackwell Farm.

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

Attached documents:

Comment ID: PSLPS16/6332  Respondent: 15588865 / Michael Hurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I would like to place an objection into the plans of building 1,8000 houses an industrial estate and a highway on the slopes of the Hog’s Back at 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: PSLPS16/6432</th>
<th>Respondent: 15590689 / Deborah Pickford</th>
<th>Agent:</th>
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<tbody>
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<td>1 destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty</td>
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<td>2 remove 72 hectares of scenic farmland and additional ancient woodland from the green belt</td>
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<td>3 increase tailbacks on the A31 and traffic congestion</td>
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<td>4 result in rat - running through local roads 5add to Guildford's pollution.</td>
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<th>Comment ID: pslp172/3256</th>
<th>Respondent: 15591585 / John Thompson</th>
<th>Agent:</th>
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4. I object to the hiding of development by “deferment” (A24, A25, A26, A43)
This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

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

Attached documents:

Comment ID: PSLPS16/6602  Respondent: 15596321 / Jean Drummond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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 plans at Blackwell Farm. This land should not be used for house building.

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

Attached documents:

Comment ID: PSLPS16/6631  Respondent: 15598113 / David J. Blackbourn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Site Allocation Policies: I am in support of the development of Blackwell Farm (Site Allocation A26) being in the Local Plan but believe that it should be extended to provide for 3,000 homes.

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

Attached documents:

Comment ID: PSLPS16/6732  Respondent: 15601985 / Sally Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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


I was born, schooled and brought up in the Guildford area.

I wish to add my strong OBJECTION to the site allocation plans to the A26 Blackwell Farm.

The knock-on effect of traffic build up and general disruption to the area does NOT bear thinking about.

Please accept this email as an objection.

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

Attached documents:
public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worpleson and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

Attached documents:

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**Comment ID:** PSLPS16/6798  **Respondent:** 15604065 / Abigail Harrison  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to the proposals for Blackwell farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

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

**Attached documents:**

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**Comment ID:** PSLPS16/6830  **Respondent:** 15607393 / Lucy While  **Agent:**

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

I object to the proposals for Blackwell farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

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

**Attached documents:**
I am writing to object, in the strongest terms possible, to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm. I live on High View Road, and chose to live in this location in Guildford in order to be close to natural beauty, which will be destroyed if these plans are agreed.

I believe that if this Plan is agreed, the cost to the environment and ancient woodland will be extremely high, destroying natural habitats. The beautiful scenery and the area’s history will be destroyed. Another major concern is the increase in traffic problems that this will cause. The A3 and A31 are regularly overloaded as it is, with long traffic jams occurring every day. To add the traffic associated with 1,800 houses and an industrial park to this area will be catastrophic, and the increase in pollution will be very damaging to the whole town.

My husband and I chose to move to Guildford because we love it. We love the town centre, and the beautiful green areas surrounding it; for us, Guildford has the perfect balance – particularly the Hogs Back area where we live, which has been designated as an Area of Outstanding Natural Beauty. If this plan is agreed, sadly, we will definitely look to move out of Guildford. We sincerely hope it will not come to this. Please listen to the views of the people who live in Guildford and love the town, and please put the beauty of the town, and the importance of the environment, before profit. I believe that the University has other options they could pursue, instead of encroaching on green belt land.

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

Attached documents:
I object to the proposal to develop site A26. This seems to be an extensive development planned for an entirely inappropriate place (next to AONB). Such a location should only be considered as a last resort, not as a large, new centre.

It seems unbelievable that the site could be managed without causing significant additional congestion to current roads, as a site “on the edge” of Guildford would obviously create more traffic to the centre. Extra infrastructure through this area would damage the environment further.

Encroaching on the AONB and AGLV is not a good plan for 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: pslp172/5061  
Respondent: 15610177 / Kathleen Atkins  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: pslp172/1735  
Respondent: 15611489 / Emma Meekings  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID:  PSLPS16/7002  Respondent:  15616065 / Alex Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

As a resident I strongly object to the Proposals for Blackwell Farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

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

Attached documents:

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Comment ID:  PSLPS16/7012  Respondent:  15616065 / Alex Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Objection to Blackwell Farm Development/Normandy

The impact on Wanborough from such a large numbers of houses, commercial, retail and community uses such as schools etc. is cause for concern as to how the surrounding area will cope. The current infrastructure around Wanborough is creaking and this would introduce a high level of new traffic into probably the most congested part of the county. The current drawings do not give details of any major transport improvements but it is identified within the local plan that this will be an issue. It would be reassuring to have some clear plan as to what this might look like but at this stage it is no more than speculation.

The requirement for this amount of homes is based on the SHMA which assess the housing need going forwards and these figures are disputed, however if we assume that the numbers are correct the plan to provide such large numbers of homes in one place will put a heavy burden on a small area, though the two sites are not directly connected the large housing increase suggested for Normandy village would presumably see a very marked increase in traffic traveling through Wanborough to get to the main trunk routes of the A31 and A3.. Development within villages in the Green Belt is supposed to be limited to small scale infilling, which Normandy is definitely not.

In the local plan there are some clear statements as to the type and mix of houses to be provided, on any development of 5 or more homes, or sites of 0.17 ha regardless of number of homes, 40% of all homes on the sites must be affordable homes and developers will be expected to provide land for affordable homes at nil value.

It is stated that permission will not be granted for developments that would result in net loss of any affordable homes that were secured by planning obligation or condition. This provision is based on the fact that it has been assessed that 50% of all households over the plan period will not be able to buy or rent homes without assistance.
Developers will be required to meet the costs of affordable housing and are expected to take this into account when agreeing the price paid for the site. This will mean that the 60% of houses built for Market Homes will need to cover this cost making them ever more expensive and out of reach of many local people.

**Blackwell Farm Type and Mix**

No indication is given for the what will actually be built, however the council has given an assessment of the demographic between affordable and market homes which fall into two categories:-

Affordable homes - there is a need for 40% one bed, 30% two bed, 25% three bed and 5% 4 bed. This would lead you to believe that the affordable need is not in family homes with 70% of the housing being one and two bed.

Market Homes - there is a need for 10% one bed, 30% two bed, 40% three bed and 20% four bed. This would lead you to believe that there is greater need for family homes with 60% of the housing being three and four bed

Blackwell Farm - mixed used development 1800 homes (Based on the split above)

Affordable 720 – 288 one bed, 216 two bed, 180 three bed, 36 four bed.

Market Homes 1080 – 108 one bed, 324 two bed, 432 three bed, 216 four bed

Total 1800 – 396 one bed, 540 two bed, 612 three bed, 252 four bed

The very high levels of one and two bed within the affordable sector could be due to the projected high levels of student accommodation that will be needed if the university continues to grow, Surrey University should be responsible for housing any increase in student numbers on its own campus. It should not be taking away lower cost accommodation stock from local people.

The increase in housing at both the ends of the parish boundary will have an effect on the people living within Wanborough. How detrimental this will actually be depends on how well thought out the infrastructure plan is, GBC/SCC/Highways record in this area over the last few years has been poor.

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

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

I am at a loss to understand why this Planning Application has not been dismissed out of hand for several reasons.

As a local resident trying to get into Guildford on a daily basis along the A31 and A3, the traffic we experience already makes what should be a 10 minute journey into one that can take as long as 45 minutes, the road infrastructure will not cope with the additional 3k-4k cars that this development will engender.

The new proposed road from the Research Park to the new estate will cut through important Ancient Woodland which has, to date, acted as the original boundary to defensible Green Belt and this together with the wider area is an important wildlife habitat for numerous animals, plants and insects.

This area that is under threat comprises an AONB, Area of Great Landscape and Greenbelt which should be protected by law, so again, a development of this size (or any size to be honest) should not be contemplated on this site particularly given the fact that there are already empty premises that could be utilised and there is room on the Research Park to build more large commercial buildings if required.

Also the infrastructure we have currently will not cope with the additional requirements of the development which will mean that more will need to be done possibly affecting a larger area than currently proposed and given the additional pollution this will cause means the the health of current residents is likely to suffer in the short, medium and longer term.

This is not something that should be considered just because the University needs to add to its coffers. It already has outstanding Planning Consent to build student accommodation on Moor Park and this should be enforced before any further Planning is even considered.

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

Attached documents:

Comment ID: PSLPS16/7065  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

I object to policy A26 Blackwell Farm There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield
farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We 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 sites 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
- 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 for Nitrous Oxide.

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

The reference to the A31/Down Place access as being the Primary Access should be changed in the column headed “Allocation”, final bullet point, and in the column headed “Requirements,” first and third bullet points. Further assessment work needs to be undertaken to determine the appropriate access strategy. Within a sustainable urban extension, we would want to encourage Guildford town bound movements to be by non-car modes. Whilst the Down Place access provides for vehicular access to the West, towards Winchester, southbound on the A3, to Portsmouth via Down Lane, and eastwards into Guildford town, we would expect A3 London/M25/ east Guildford/Woking traffic, to use the A3 Egerton Road access.

We would further suggest that the Site Allocation plan on page 185 should include the land necessary to provide the access link to the east (i.e. into Egerton Road). According to the current plan, the site is isolated from the east, especially given that the Ancient Woodland provides a barrier between the site and the urban fabric of West Guildford.

Under “Requirements,” fourth bullet point, reference to the need to manage this through-link should also be included in the text.
Under “Requirements,” a bullet point should be considered for inclusion under the heading, “Infrastructure,” requiring the provision for extended/new bus services to provide seamless connectivity between the site; the existing western suburbs of Guildford; the town centre and also any through journeys that can be provided in the future to the eastern fringes of the town. Whilst the provision of the Sustainable Movement Corridor might be considered sufficient, other bus services and routes into the development might also be needed.

Also under “Requirements,” it might be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford.

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

**Attached documents:**

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**Comment ID:** PSLPS16/7142  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A26</td>
<td>Blackwell Farm, Hogs Back, Guildford</td>
<td>Westborough</td>
<td>Mixed use Development</td>
<td>Adjacent</td>
<td>Strawberry Grove PAWS, SU963497 Dean Bottom ASNW, SU963494 Unnamed ASNW, SU957498</td>
</tr>
</tbody>
</table>

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

**Attached documents:**

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**Comment ID:** PSLPS16/7441  **Respondent:** 15647137 / Geoffrey Lippitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We are writing to record our objection to your proposed development of this site.

Our objection is made for the following reasons:

- The removal of farmland,
- The consequent traffic increase and delays on the A31,
- The increased pollution this will cause to Guildford
- The removal of an area of natural beauty.
We 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 sites 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
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  local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

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1. I object to the inclusion of development A26 Blackwell Farm within the local plan. It is a green belt site and no
   exceptional circumstances have been proved.

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

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   exceptional circumstances have been proved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY A26 BLACKWELL FARM

I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

- Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

- Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

- Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

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

Attached documents:

Comment ID: pslp172/3633  Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Sites – in addition, we note that the A26 site (Blackwell Farm), to the west of Guildford, has been retained with a total yield of 1,800 homes, but that only 1,500 of these dwellings are expected to come forward in the plan period. Compton Parish Council has expressed concerns over the allocation in terms of potential highways impacts on local communities, including Binscombe and Farncombe within Waverley. Again, it would be important for any cross boundary impacts from the development on these communities to be identified and addressed.

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

Attached documents:

Comment ID: PSLPS16/7814  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

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

Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.

We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater treatment capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the infrastructure is in place ahead of occupation of the development. We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 1800 dwellings and other development exceed the capacity trigger levels for available network. The site would drain to Hockford STW which has a current Population Equivalent of 15,400. The scale of development proposed is significant for a STW of this size so a developer funded impact study required to understand implications of development.

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

Attached documents:
Comment ID: PSLPS16/7906  Respondent: 15682465 / Nick Beesly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

Site Allocation Policies; I am in support of the development of Blackwell Farm (Site Allocation A26) being in the Local Plan but believe that it should be extended to provide for 3,000 homes

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

Attached documents:

Comment ID: PSLPS16/7959  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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 Blackwell Farm in this Local Plan, for the following reasons:

• The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
• Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
• The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
• Blackwell Farm is very effective in fulfilling the functions of Green Belt.
• Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
• More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
• The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
• Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in “Guildford urban area” and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

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

Attached documents:

Comment ID: PSLPS16/7965  Respondent: 15688481 / Sally Lescher  Agent:
I object to policy A26 Blackwell Farm

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation
Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

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

Attached documents:
I object in the strongest possible terms to the expansion of Guildford as represented by this local plan.

I object to development within the green belt and in sight of the AONB.

I object to the proposed development at site A26 Blackwell farm where an independent landscape evaluation study (funded by Compton, Worpleston and Wanborough Parish Councils) has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). The study will now be forwarded to Surrey CC/Natural England with a request that Blackwell Farm is included as a candidate area in the forthcoming AONB boundary review. The PCs were prompted to do this when it was brought to their attention that Blackwell Farm had been omitted from Surrey CC’s landscape evaluation on behalf of Surrey Hills AONB Board (despite a previous study suggesting that it was likely to meet AONB criteria and merited assessment).

**Transport survey for A26 Blackwell Farm.**

Compton PC and Compton Village Association have jointly commissioned a Technical Note by traffic consultant RGP to look at the implications of the Blackwell Farm development, and the proposed new link road from the A31. The results show:

- The road infrastructure costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) are far in excess of what has been estimated in the Local Plan and would not justify a development of this size. The scheme is therefore economically unviable.
- The new 4-way junction proposed at Down Place on the A31 would require more land-take than the Local Plan has suggested - it would involve widening the A31 bridge over the A3. No money has been allocated for this bridge-widening scheme and there is no indication that Highways England has approved it. Given the traffic flows, it is more likely that a large roundabout would be needed at this junction and this would severely impact the Surrey Hills Area of Outstanding Natural Beauty.
- The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital.

All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (eg Puttenham Interchange). No transport infrastructure requirements for the site have been identified to address the u-turning problem on the A31 (although we know SCC is trying to close the East Flexford gap).

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

**Attached documents:**

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**Comment ID:** PSLPS16/8209  **Respondent:** 15724961 / M.R McPherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
• add to Guildford's pollution
• treasure with pride the natural beauty of the Hog's Back

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 A26: BLACKWELL FARM, HOGS BACK

Highways England notes the proposed reduction in the number of dwellings to be delivered during the plan period.

Highways England also notes that it is proposed that a through vehicular link between the A31 Farnham Road and Egerton Road will now be controlled to provide a new route for employees, residents and emergency services. It is noted that this is now said to “reduce impact on the A31/A3 junction, in advance of the delivery of Highways England’s A3 Guildford scheme”. We are keen to work with GBC and/or the site promoter to understand the degree of impact reduction on the A31/A3 junction ahead of a potential A3 scheme. Further it is unclear at this stage what level of growth can be delivered in advance of a potential A3 improvement and the consequences for growth at the site if there is no A3 improvement.

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

Attached documents:

Comment ID: pslp172/2757  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

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

We object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. As for Gosden Hill, the deferral is not a genuine reduction but merely a presentational exercise.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly. The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildfordbound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.

Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.
The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns. The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

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

**Attached documents:**

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**Comment ID:** pslp172/1293  **Respondent:** 16209409 / Natural England (Amy Steel)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Policy A26: Blackwell Farm, Hogs Back, Guildford
This site is within the setting of the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.

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

**Attached documents:**

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**Comment ID:** pslp172/23  **Respondent:** 17111713 / Tracy Millett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

This site is within the setting of the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

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**Attached documents:**
We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/44  Respondent: 17127617 / Josephine Garrick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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

Attached documents:

Comment ID: pslp172/46  Respondent: 17128065 / W K Mc Cullough  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/99  Respondent: 17134433 / Janet Mary  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/100  Respondent: 17134465 / Brenda Sills  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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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].

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 exceeds safe EU limits for Nitrous Oxide.

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Attached documents:

Comment ID: pslp172/162   Respondent: 17142273 / S. Woodgate  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4884   Respondent: 17142273 / S. Woodgate  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/163  Respondent: 17142305 / Michael Sydney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/208  Respondent: 17143713 / Richard William Scholfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<tr>
<th>Comment ID:</th>
<th>pslp172/201</th>
<th>Respondent:</th>
<th>17143841 / Michael Riddy</th>
<th>Agent:</th>
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Attached documents:
Comment ID: pslp172/195  Respondent: 17144001 / Helen & John Munday  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/193  Respondent: 17144225 / B. Hall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/191  Respondent: 17144385 / Valerie Parsons  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/189  Respondent: 17144417 / C. Riddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/192  Respondent: 17144449 / Gladis Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/252  Respondent: 17151649 / Susan Gatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/262  Respondent: 17151713 / Mr & Mrs M Dear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/260  Respondent: 17151745 / Gillian Harrold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/259  Respondent: 17151809 / William Kenneth Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/258  Respondent: 17151841 / Susan Lesley Carr  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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### Comment ID: pslp172/257  Respondent: 17151873 / Sally Horan  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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### Comment ID: pslp172/254  Respondent: 17151905 / Hannah Lane  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/253  Respondent: 17151937 / M Stannard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/269  Respondent: 17151937 / M Stannard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/327  Respondent: 17160545 / Neil Bowker  Agent: Alan Cook

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/328  Respondent: 17160737 / Thomas Wood Grilla  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: pslp172/347  Respondent: 17161281 / Jonathan Billimore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/346  Respondent: 17161313 / Maria Swaden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/345  Respondent: 17161345 / Francesca Dorling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Comment ID: pslp172/344  Respondent: 17161377 / Nancy Ena Thomson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Attached documents:

Comment ID: pslp172/432  Respondent: 17169729 / Michelle Sanders  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/431  Respondent: 17169761 / S. Weinstock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/428  Respondent: 17169825 / Chris Austen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/424  Respondent: 17169857 / Roger Gabriel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/418  Respondent: 17169985 / Ben Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/417  Respondent: 17170049 / Alison Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/410  **Respondent:** 17170273 / Sally Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/409  **Respondent:** 17170369 / William Arthur Collin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/408  Respondent: 17170401 / Mack Daneis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/407  Respondent: 17170433 / Chrisi Nice  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/466  Respondent: 17174369 / Alison Woodgara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/471  Respondent: 17174433 / Shaun Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/500  Respondent: 17175105 / Wendy Horwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/499  Respondent: 17175169 / Jamie Avenell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/520  Respondent: 17178625 / John p Anderman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/524  Respondent: 17178817 / Jill Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/549  Respondent: 17184769 / Alan Thorne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/550  Respondent: 17184801 / David Phillip Griffiths  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/552  Respondent: 17184833 / Malcolm Airey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1225  Respondent: 17184833 / Malcolm Airey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Policy A26 (Blackwell Farm)

As a resident of Compton I strongly object to the proposal to build 1,800 homes on the Blackwell Farm site as it will have a very negative on the environment in the surrounding area.

MORE TRAFFIC. The site is dependent on a new access road from the A31 Hog's Back to the hospital roundabout at Egerton Road. with a new signalised junction on the A31 at the entrance to Down Place, at the top of Down Lane. An independent traffic study commissioned by Compton Parish Council has shown that this new junction would result in more queuing on the I-log’s Back and on the A3 during the morning peak-hour. In fact, the queue builds up all through the day, not just during rush hour. As a result, Compton will see a surge in traffic as Guildford-bound drivers seek out the fastest route and drive along the B3000 or Down Lane. The recent chaos caused by the closure of the A31 westbound because the surface melted in the heat demonstrated what could happen and the probability of vastly increased numbers of vehicles using the roads will multiply the problem a thousandfold.
MORE POLLUTION. Levels of Nitrogen Dioxide (NO2) that are consistently well above the EU legal limit have been recorded at the A3 end of 'The Street in Compton over the last two years. The Parish Council is expecting that this section of the 133000 will he made an Air Quality Management Area soon. Any increase in traffic levels through Compton, such as the proposed access road to Blackwell Farm, will make this situation worse.

LOSS OF NATIONALLY IMPORTANT COUNTRYSIDE. The new access road would cut through the Surrey hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the I-log's Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The development site includes high-grade farmland and lorms 20% of Compton's green belt.

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Comment ID: pslp172/553  Respondent: 17184865 / Sylvia Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: pslp172/554  Respondent: 17184897 / A C Stockbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/555  Respondent: 17184929 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/556  Respondent: 17184961 / Colin May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/576  Respondent: 17186465 / Ian Robert Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/583  Respondent: 17188769 / D.J Geenslade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/616  Respondent: 17191681 / Andrew Dewman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/617  Respondent: 17191713 / Linsey Clare Dodds  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/618  Respondent: 17191745 / Martin Ward  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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:** pslp172/630  **Respondent:** 17192033 / Nicky Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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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:** pslp172/631  **Respondent:** 17192065 / John Peter Rasmussen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- 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 exceeds safe EU limits

We would appreciate it if you could consider our concerns with regards these development plans.

**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: pslp172/673  Respondent: 17199681 / James Andy  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/674  Respondent: 17199873 / Nicola Andy  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: pslp172/709  Respondent: 17201281 / Seon-Jeong Ki  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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: pslp172/710  Respondent: 17201313 / J Rowland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We 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:

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

Attached documents:

Comment ID: pslp172/711    Respondent: 17201345 / Malcolm M Smith Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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: pslp172/712    Respondent: 17201377 / J V Tucker Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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: pslp172/725  Respondent: 17201633 / Brian Dunce  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/726  Respondent: 17201665 / Christine Hodgson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
**Comment ID:** pslp172/727  **Respondent:** 17201697 / Martin Ham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/730  **Respondent:** 17201761 / C.J Holton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/731  **Respondent:** 17201825 / John Way  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/732  Respondent: 17201857 / John Bradford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/742  Respondent: 17203521 / Nicholas Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/751  Respondent: 17204321 / Jenifer Luck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/753  Respondent: 17204385 / Jill Kilburn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/755  Respondent: 17204449 / Susan Bond  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/778  Respondent:  17205473 / Carolyne Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/779  Respondent:  17205505 / Stephen Arthur  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/786  Respondent: 17205793 / Mr And Mrs Bishop  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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We 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:

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Attached documents:

Comment ID: pslp172/785  Respondent: 17205825 / A. Paul Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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We 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:

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Comment ID:  pslp172/787  Respondent:  17205857 / Simon Brundan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Comment ID:  pslp172/788  Respondent:  17205889 / Marian Williams  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Attached documents:

Comment ID: pslp172/792  Respondent: 17206081 / David Knapp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/793  Respondent: 17206113 / B.I. Killen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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- 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.).

- 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 exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

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Attached documents:

Comment ID: pslp172/840  Respondent: 17209025 / Futura Medical plc (James Barder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I am writing to raise my serious concerns over the proposed development site at Blackwell Farm. As a long term tenant of the Surrey Research Park and local employer I have seen a steady and continuous increase in traffic onto and off the Research Park resulting in a serious bottleneck on and off the A3 and significant delays for my staff.

I recognise that the council will be under significant pressure to build more housing however and whilst I support such development I do have concerns if it is going to cause significant further congestion without the necessary access infrastructure spending. My understanding is that independent traffic studies echo these concerns and therefore urge an immediate re-think on providing sufficient access to not only address traffic requirements to this new development but the current requirements of both the hospital and research park.

Further congestion and delays with access is likely to result in Futura's relocation from the Research Park and subsequent loss of jobs in the vicinity of Guildford.

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

Attached documents:

Comment ID: pslp172/5406  Respondent: 17209601 / Nikki More  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We would like to raise our concerns over the increased amount of traffic that would be added to the already horrendous traffic situation in the area…. we already have all the traffic for Tesco’s, The Royal Surrey, The University, The Surrey Sports Park, Park N Ride and the Surrey Research Park. It has taken me personally an hour to travel just 0.4 miles on several occasions in the past couple of years purely down to the volume of traffic that already exists on Gill Avenue and Egerton Road and the surrounding areas at peak hours and adding thousands more cars to everyone’s rush-hour journey will be detrimental to businesses in the area and the staff who work there. I can honestly say I would strongly advise anyone looking for Office space on the Surrey Research Park to think again, purely down to the already horrendous traffic situation.

We object to Guildford Borough Councils changes to to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.), which:

- 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.
• 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.).

• 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 exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

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

Attached documents:

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**Comment ID:** pslp172/850  **Respondent:** 17209665 / Sam Guest  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Dear Sir/Madam,

As an employee on the Surrey Research Park, I write to voice my objections regards Guildford Borough Councils changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.) which:

• Creates more office space on an extended Business Park (Policy E4), which will increase peak-time congestion, particularly around the Hospital and A&E (public safety must be of paramount concern), and will also encourage rat-running through residential areas. Traffic is already incredibly congested in this area and often causes knock on effects backing up onto the A3.

• 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.). I strongly believe as someone who works on the business park that a major attraction of being here is the stunning surroundings which would inevitably be eroded by this additional development.

• 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. The road network is not setup to cope with this additional traffic and the plans in place seem wholly inadequate (2.14a).

• Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

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

Attached documents:

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**Comment ID:** pslp172/854  **Respondent:** 17209793 / Evolve Dynamics (Michael Dewhirst)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/862  Respondent: 17210177 / Janet Block  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/860  Respondent: 17210209 / M Whittaker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/873  Respondent: 17211553 / Valerie Sharp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/874  Respondent: 17211585 / Anna Muller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: pslp172/888  Respondent: 17218273 / Anthony Lisuer  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: pslp172/889  Respondent: 17218401 / Susan Jane Penny  Agent:

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

We 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:

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

Attached documents:

Comment ID: pslp172/904  Respondent: 17219585 / Tim Gammon  Agent:

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

We 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:

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

Attached documents:

Comment ID: pslp172/905  Respondent: 17219649 / Maggie Gammon  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: pslp172/906  Respondent: 17219681 / Charisse Otty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/907  Respondent: 17219713 / M. J Forgan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

**Comment ID:** pslp172/921  **Respondent:** 17220321 / Bernard Polack  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

**Comment ID:** pslp172/922  **Respondent:** 17220385 / Gary Crosby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/923  Respondent: 17220417 / Peter Mussell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/924  Respondent: 17220481 / Paul & Anna Coates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
**Comment ID:** pslp172/925  **Respondent:** 17220513 / N. R. E Bailey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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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:** pslp172/947  **Respondent:** 17225217 / CN Bamford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We wish to **object** to the inclusion of Blackwell Farm as a development site.

The area merits AONB status according to the independent landscape study you are aware of.

Traffic is already a massive problem on the A3 around the hospital especially but not only at peak times. The development will add to this congestion unnecessarily, and spread it to nearby residential areas. This ignores independent expert traffic studies of which you are also aware. Air pollution in nearby areas already exceeds EU safe limits with implications you well know for the health of children especially.

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

**Attached documents:**

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**Comment ID:** pslp172/948  **Respondent:** 17225281 / Bob McShee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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**Section page number** 724 of 941  **Document page number** 725
I wish to object to the development of 1800 homes at Blackwell Farm, on land which is an Area of Outstanding Natural Beauty. Also part of the land is in the Green Belt which must be preserved for future generations. A recent land evaluation has assessed Blackwell Farm as being outstandingly beautiful that merited its inclusion in the AONB and as such it should remain undeveloped.

The existing road network between the Research Park and the A3 is already heavily congested and cannot take the increase in traffic volume which would be caused by this development.

The existing road infrastructure which already serves the Research Park, the Hospital, the Sports Park, the University, Tesco and Park Barn would need to be increased in capacity, which would appear to be a physical impossibility.

If the vehicular access via Down Place is to be used, then additional traffic will cause chaos on the A31 which is already heavily congested. Until Highways England have issued their proposals for improvements to the A3, A31 and road junctions which serve Guildford then no further consideration should be given to the development at Blackwell Farm. The housing developments in Ash will mean that more traffic will use the A31 and A323, so this will cause, cumulatively, severe transport problems on roads to the west of Guildford.

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Attached documents:

Comment ID: pslp172/962  Respondent: 17227329 / Susan Jean Lawton Drummond

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/963  Respondent: 17227393 / Edgar Ronold Hall

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
Comment ID: pslp172/968  Respondent: 17227553 / Michele Woodger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/970  Respondent: 17227585 / Helen Barton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/971  Respondent: 17227617 / David Buisson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/973  Respondent: 17227649 / Joan Kennedy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/976  Respondent: 17227713 / J.E Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/982  Respondent: 17227969 / Jeremy Garson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/984  Respondent: 17228001 / Patricia Garson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/990  Respondent: 17228545 / Denis Parnel  Agent:
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Attached documents:

Comment ID: pslp172/991  Respondent: 17228641 / Emma C. Parnell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Attached documents:

Comment ID: pslp172/1039  Respondent: 17234689 / Joanna Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1040  Respondent: 17234753 / D Foster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1046  Respondent: 17234977 / Tim Chilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1047  Respondent: 17235009 / Philip-Marina Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID:  pslp172/1048  Respondent:  17235041 / Marie Benson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID:  pslp172/1049  Respondent:  17235073 / John Benson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<th>Respondent: 17235105 / Carol Perry</th>
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<th>Respondent: 17235169 / Pamela and Robert Snare</th>
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<th>Respondent: 17235329 / Philip Airey</th>
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Attached documents:

Comment ID: pslp172/1057  Respondent: 17235457 / Rick Kimber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1058  Respondent: 17235553 / John Hervey Brown Frogett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
Comment ID: pslp172/1059  Respondent: 17235585 / Frances Chilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1060  Respondent: 17235617 / Jack Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1061  Respondent: 17235681 / JOYLE INGLESANT  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1062  Respondent: 17235873 / Tracy Dorey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1109  Respondent: 17242369 / Denise Elizabeth Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1126  Respondent: 17243553 / Suzanne Mintern  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1127  Respondent: 17243585 / Anthony Mintern  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1135  Respondent: 17243745 / Benu Datta  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1136  Respondent: 17243777 / Victoria Nightingdale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/1137  **Respondent:** 17243873 / David Thorpe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/1142  **Respondent:** 17244097 / David bakerville  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1177  Respondent: 172444545 / Daphne Robertson  Agent: 

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

Attached documents:

Comment ID: pslp172/1177  Respondent: 17244609 / Andrew Civil  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/1175  Respondent: 17244641 / Lisa Tufnell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1169  Respondent: 17244673 / Stanley Levy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1182  Respondent: 17245889 / Melissa Fay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1190  Respondent: 17246401 / Michael and Anthea Clarke stanmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1211  Respondent: 17247681 / Nicola Gales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1213  Respondent: 17247713 / Melanie Chaplin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1232  
Respondent: 17248865 / Jeniffer Williams  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1299  
Respondent: 17252993 / Christopher Twin  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I have some serious reservations and must protest at the proposed plans to expand the area of the Surrey Research Park and Blackwell Farm.

I commute into the Surrey Research Park from Hampshire, proceeding north up the A3 into the Guildford area, and have had enough of the current situation, let alone any future negative impact caused by further development in the area.
Just today I have been witness to a number of potential incidents that are already not being addressed. These observations typically include, but are not limited to:

- The Tesco's roundabout junction coming off the A3. I’ve seen wing mirrors ripped off and bumpers scraped off the cars that have to sit half and half on the A3 because the slip road is static and filled with traffic.
- The junction coming off the Tesco's roundabout to proceed west on Egerton Road where the outside lane of cars continuously cut up those on the inside, but do so on the very exit of the roundabout which is exceedingly dangerous. This part should be widened or the priority of lanes needs addressing.
- At this same junction there have been accidents involving pedestrians trying to cross where it is exceedingly busy. Either remove the possibility of crossing or provide a safer means for pedestrians to cross by way of bridge or underpass.
- Proceeding west across the junction from Egerton Road into Gill Avenue where the traffic is funnelled into a single lane simply does not work. I appreciate that this may well be a hospital road but the fact remains that a great number of businesses are in the Surrey Research Park and they require access. This would benefit from an additional lane and you should consult the hospital on the matter. It may also be a consideration to add access into the research park from the back of the hospital through from Park Barn.
- As a matter of etiquette, cars are not funnelling into the single lane at this point nicely and is a source of much road rage each day for many drivers. Perhaps a sign to remind people?
- Cars actively using the hospital entrance access road as a shortcut to circumnavigate the traffic on Gill Avenue and cut in further up. I'm sure you can appreciate how ridiculous and unnecessarily dangerous this is.
- For the underpass on Egerton Road, cars are accelerating down the outside lane going West to then cut up those queuing on the inside lane who are waiting to proceed across the grid locked roundabout. They do so in a very aggressive fashion and I'm surprised we've not seen a great deal more accidents.
- On the same underpass, people (possibly students) are walking underneath alongside the road using the narrow strips of pavement that are there. As a driver, this makes me nervous as I don't believe pedestrians should be in such close proximity to moving vehicles.

Whatever research you've done, it is flawed, and in no way considers the environmental impact or the sanity of those commuting in and around the area. The potential effect is that you risk businesses moving away from the area, probably to Hampshire, because the well being of their staff is also being affected.

Adding more commuters into the area without addressing the existing problems is unsafe and ludicrous. You will be affecting rush hour journey times, suffocating local businesses and their ability to function, as well as making it harder for emergency services to gain access to the hospital. As such, myself and many others would like to state the following:

We object to Guildford Borough Councils changes to to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.), which:

- 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.
- 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.).
- 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 exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

Please address these concerns and drop your future development plans in their current form.

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

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**Comment ID:** pslp172/1306  **Respondent:** 17253729 / Mr & Mrs Tasker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/1307  **Respondent:** 17253825 / William Handley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1308  Respondent: 17253857 / Diana Hickox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/1310  Respondent: 17253889 / Lynn Harmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
Comment ID: pslp172/1311  Respondent: 17253921 / Phyllis Reeves

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1312  Respondent: 17253953 / Robert Coopes

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1314  Respondent: 17253985 / Evenlyn Mary Simmons

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1333  Respondent: 17254369 / Patricia Elizabeth Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1352  Respondent: 17254977 / Michael Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1342  Respondent: 17255297 / Nigel Collinson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1341  Respondent: 17255361 / Graham Sercombe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1418  Respondent: 17268833 / Philippa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1419  Respondent: 17268865 / Gaye Henderson Elvidge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<td>It is my understanding that this proposal is a major shift, that disregards The expert Landscape Study – The change along with umpteen other proposed changes have been high lighted and are well documented. If these objections to change are in themselves not enough then for once take notice of local opinion an the subject.</td>
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<th>Respondent: 17269537 / Barry &amp; Sonia Talman</th>
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**Comment ID:** pslp172/1432  **Respondent:** 17269601 / Margaret Ann Rogers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

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**Comment ID:** pslp172/1433  **Respondent:** 17269633 / Dennis Patrick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1440  Respondent: 17269825 / Joanna Radomska-Lane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1441  Respondent: 17269889 / Barry John Milet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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- it agriculture land (moderate/good) within the green belt.

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Attached documents:

Comment ID: pslp172/1454  Respondent: 17270081 / Mr & Mrs Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1455  Respondent: 17270113 / E.R. Willmott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
**Comment ID:** pslp172/1462  **Respondent:** 17270241 / I.A. Woodhouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/1464  **Respondent:** 17270337 / John William Stolons  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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**Comment ID:** pslp172/1466  **Respondent:** 17270401 / Christina Rule  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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### Comment ID: pslp172/1594  **Respondent:** 17278721 / Denise Walters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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### Comment ID: pslp172/1598  **Respondent:** 17278753 / Laura Farrell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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### Comment ID: pslp172/1599  **Respondent:** 17278817 / Janette Costello  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1601  Respondent: 17278849 / Calogera Sanfilippo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/1616  Respondent: 17279105 / Claire Bryant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: pslp172/1621  Respondent: 17279617 / Virginia Angus  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I am writing to object to the proposed development of 1,800 homes at Blackwell Farm site (at the foot of the North side of the Hog's Back).

I live in the beautiful village of Compton and I feel very privileged to live here, after having moved from London. Sadly the traffic through Compton, both day and night is horrendous. It is continuous and it has been reported that the levels of Nitrogen Dioxide are consistently above the EU legal limit so any increase in traffic levels through Compton, such as the proposed access road to Blackwell Farm, will make this situation worse. Also, as you know, the site is dependent on a new access road from the A31 Hog's Back to the hospital roundabout at Everton Road, with a new signalised junction on the A31 at the entrance of Down Place, at the top of Down Lane. Compton cannot cope with the traffic as it is. Everyone avoids walking down The Street (the main road through the village) as cars and heavy articulated lorries are too close for comfort.

Also, the Surrey Hills is an Area of Outstanding Natural Beauty. I feel it is my moral duty to protect this beautiful ancient woodland and the wildlife that is dependant on it for our's and for future generations. We are privileged to have such amazing wildlife and beautiful green land, why would you want to destroy this? Something that once done is irreversible. I do not believe that you have considered the long term consequences of your decision. Great, have lots of houses, but what of people's mental health and wellbeing?

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

Attached documents:

Comment ID: pslp172/1622  Respondent: 17279681 / J Burningham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

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Attached documents:

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Comment ID: pslp172/1694   Respondent: 17284417 / Carol Davenport   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please be advised that 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:

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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: pslp172/1697   Respondent: 17284449 / John Davenport   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  
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: pslp172/1744</th>
<th>Respondent: 17285857 / Network Rail (Daniel Chalk)</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<td></td>
</tr>
</tbody>
</table>

**Policy A26: Blackwell farm, Hogs Back, Guildford**

Network Rail have worked closely with Guildford Borough Council and other interested parties on a potential station within this site allocation. A GRIP 2 study was commissioned by Guildford Borough Council that has looked at a location within this site and one within **Policy A59** as potential new station locations.

We will therefore continue to work with the proposer of the new station as required and necessary to ensure that railway requirements are taken account of.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1743</th>
<th>Respondent: 17285921 / P E Batters</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1752  Respondent: 17286241 / Robin Burns  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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Attached documents:

Comment ID: pslp172/1753  Respondent: 17286273 / Clive Gay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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Comment ID: ps1p172/1754  Respondent: 17286305 / Anita Trevena  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: ps1p172/1755  Respondent: 17286337 / Adam Trevena  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
### Comment ID: pslp172/1756  Respondent: 17286369 / Heather Harvey  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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### Comment ID: pslp172/1757  Respondent: 17286401 / Carol Burns  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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### Comment ID: pslp172/1758  Respondent: 17286465 / Margot Trevena  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1759  Respondent: 17286529 / Anna Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1761  Respondent: 17286561 / Pirjo Konto-Blunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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Attached documents:

Comment ID: pslp172/1793  Respondent: 17287873 / Vera Wilkinson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/1794  Respondent: 17287969 / Marion Gooding  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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- 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.
- 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.).
- 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 exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

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

Attached documents:

Comment ID: pslp172/1919  Respondent: 17291745 / Sophie Woolliscroft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

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- 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 exceeds safe EU limits.
- Further residential houses in this area will continue to swell the already overloaded peak time traffic on many major roads in the area.
- Trains to London from Guildford station are already very over-crowded as peak-time, many times you cannot even get onto the train service never mind trying to get a seat. More people living in the area and using these facilities will further compound the problem.
- Public facilities such as schools & leisure centres are currently very busy and over-crowded, significant population rises in the local area will create an overwhelming burden on their resources & facilities.

I cannot emphasise enough the traffic problem that already exists around Guildford in general, many locals have to spend hours stuck in this traffic whilst they attempt to go about their daily lives.

In my opinion, there should be no further significant increase in housing in the area until all roads are upgraded to cope with the existing levels of traffic and then a sensible-plan put in place and delivered in order to cope with the expected increase in traffic. This must be Prior-To building any significant further housing, not agreed to on a promise with a developer and then not delivered.

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

We 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:

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

Attached documents:
Comment ID: pslp172/1996  Respondent: 17294113 / Catarina Moh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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:

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

Attached documents:

Comment ID: pslp172/1997  Respondent: 17294145 / Sarah Moh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/1998  Respondent: 17294177 / Carolina Moh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/1999  Respondent: 17294209 / Christina Moh Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/2000  Respondent: 17294241 / Kenneth Michael Smart Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/2008  Respondent: 17294433 / Derek Brian Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/2009  Respondent: 17294497 / Keith Crean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: pslp172/2010  Respondent: 17294529 / Lynn Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/2012  Respondent: 17294561 / J Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: pslp172/2032  Respondent: 17295233 / Robert C. Mc Dermoon  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: pslp172/2036  Respondent: 17295297 / wendy Stephens  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: pslp172/2070  Respondent: 17296449 / Jemma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/2076  Respondent: 17296481 / Stephen Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/2078  Respondent: 17296577 / Danny Stephens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/2081  Respondent: 17296673 / David Ryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Attached documents:

Comment ID: pslp172/2089  Respondent: 17296961 / Susan Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/2092  Respondent: 17296993 / Patricia Reed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: pslp172/2100  Respondent: 17297121 / Graham Boxall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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
• 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 for Nitrous Oxide.

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

Attached documents:

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Comment ID: pslp172/2351  Respondent: 17304449 / Steve Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I wish to officially log that I object to Policy A26 and the inclusion of Blackwell Farm and surrounding green belt land as a development site [Policy A26 & para. 4.1.9]

1) 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]. This has been ignored by the council and the local plan.

2) 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. This additional office space is not required and will add additional unnecessary burden on local housing needs.

3) 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]. Traffic is already a major problem in Guilford and this development will make travel down the A3 and Hogs Back and surrounding areas unbearable.
<table>
<thead>
<tr>
<th>Comment ID: pslp172/2381</th>
<th>Respondent: 17307649 / Rick Smith</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>

I object to the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9] because it:

1. 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]
2. 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
3. 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]
4. adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26]

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: pslp172/2431</th>
<th>Respondent: 17308737 / Crimson Project Management Limited</th>
<th>Agent: (ROBINSON ESCOTT PLANNING LLP) John Escott</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</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 act for Crimson Project Management Limited. This representation relates to the proposed allocation of land at BLACKWELL FARM- POLICY A46 & PARA 4.1.9. The draft Policy A46 proposed to allocate the above site for a residentially led mixed use development including a new primary school, secondary school and other development. Our clients object to this proposed allocation on the basis that there are more sustainable options available for the provision of additional housing and education facilities through a sustainable urban extension to Fairlands where there is an established existing community with local retail and community facilities already in existence and where an extension to the village would help sustain and enhance these facilities. It seems clear that the Blackwell Farm proposal has attracted significant objection on the grounds of highway and traffic impacts of the development on the local highway network. It should be noted that there are no highway objections to the provision of a new education facility at the Rokers Farm site at Fairlands. The Blackwell Farm allocation would also have demonstrably harmful landscape impacts on land which, as the draft policy itself recognises, is variously within an Area of Outstanding Natural Beauty and an Area of Great Landscape Value. Whilst situated in the Green Belt, the Rokers site in Fairlands would not result in the same impacts on national landscape designations, nor any other planning considerations that cannot be appropriately mitigated.
In the circumstances, the proposed submission draft Local Plan should be further amended to include an allocation at the Rakers site, Holly Lane, Guildford for a mixed use development including an education facility, housing, community and other facilities.

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

Attached documents:

Comment ID: pslp172/2479  Respondent: 17314049 / Peter Turner  Agent:

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

Policy A26 (Blackwell Farm)
I am writing to object in the strongest terms to the above policy in the Guildford Local Plan. I have had a home on the Hog's Back since 1936 and the enormous increase in traffic along what used to be a single-lane country road, before it was dualled, is hard to believe.

The suggestion that 1,800 new homes should be built at Blackwell Farm with access on to the A31 Hog's Back at a signalised junction and roundabout at the top of the Farnham Road is ludicrous. This stretch of the A31 westbound before it joins the A3 northbound is notorious for traffic jams and queues, not only during peak hours but throughout the day, sometimes for no reason other than volume of traffic but exacerbated by the slightest incident occurring on the A3 or in Guildford town. The pollution caused by this increased traffic will worsen the already high levels of Nitrogen Dioxide, well above the EU legal limit, which have recently been recorded at the A3 end of Compton village.

In order to have more housing available, Surrey University could free up the housing in and around the town, presently occupied by students, by building on their land at Manor Park which they removed from the Green Belt many years ago and since then have failed to meet their obligations as part of that development.

Further damage by the University to this nationally important countryside should be prevented at all costs while other options are available to them, particularly by fulfilling their existing obligations.

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

Attached documents:

Comment ID: pslp172/4906  Respondent: 17337569 / Carol Wincott  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/4878  Respondent: 17340769 / Saima Shah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
• 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/2689  Respondent: 17344129 / E.A. Stutchbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/4924  Respondent: 17402625 / R Bhalla  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

We 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 sites 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
- 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 for Nitrous Oxide.

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

Attached documents:

Comment ID: pslp172/3275  Respondent: 17405217 / M Greene  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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 Worplesdon 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:

Comment ID: pslp172/3276  Respondent: 17405217 / M Greene  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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:

Comment ID: pslp172/3369  Respondent: 17408289 / Kate Young  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9] on the basis that it:

A) 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]

B) 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

C) 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]

D) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

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

Attached documents:

Comment ID: pslp172/3446  Respondent: 17413153 / Grahame Bunce  Agent:

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

We object to Guildford Borough Councils 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 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 questions the viability of the development (2.14a) Adds to 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:
I write to record my objection to the inclusion of Blackwell Farm as a development site in the revised draft Local Plan. This is an area where my wife and I walk on a regular basis and the proposals will negatively affect the area as follows:-

i) There will be additional congestion particularly at peak time around the hospital and beyond. Until recently I worked at the Surrey Research Park and although the introduction of the traffic lights improved the situation it is still congested on a regular basis and this development will add significantly to the problem.

ii) The traffic will add to an existing issue with air pollution in the area.

iii) There is a strong argument that part of the area should have already been categorised as an Area of Outstanding Beauty. This development appears to be totally ignoring this

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

Attached documents:

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Comment ID: pslp172/3479  Respondent: 17414529 / Graham Davies  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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 Policy A26 (Blackwell Farm) on the grounds below

Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1. It 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] 2. It 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.

2. It 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] 4. It adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

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

Attached documents:

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Comment ID: pslp172/3542  Respondent: 17416257 / Nick & Phillippa Barraclough  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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 Policy A26 (Blackwell Farm) on the grounds below

Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1. It 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] 2. It 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.

2. It 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] 4. It adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

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

Attached documents:
We 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
- 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 for Nitrous Oxide.

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

Attached documents:
We understand that the infrastructure schemes associated with this proposed 1,800-home development will wreak havoc on the surrounding road networks, affecting many roads and residents in Guildford and Waverley.

We understand that the site depends on two new schemes:

- Widening of the A3 through Guildford
- A new western link road from the A31 to the Tesco Roundabout at Guildford

Guildford Borough Council’s own traffic modelling has shown that both these schemes will result in a surge in traffic along the B3000 in Puttenham, Compton, Farncombe, Binscombe and Artington (with similar traffic increases along the parallel Charterhouse/Hurtmore and Priorsfield roads), as well increased traffic and congestion on the A31.

Compton, which will experience a 15% increase in traffic in the northbound direction alone, already has air quality problems and nitrous dioxide levels well above the EU legal limit have been consistently recorded over the past three years. The Parish Council has requested that The Street is made a Air Quality Management Area.

Aside from the congestion problems, a six-lane motorway through Guildford will cause severance, as well as increased noise and air pollution; whilst the new “western link” road will slice through the Surrey Hills Area of Outstanding Natural Beauty, through 18th century parkland and a belt of ancient woodland.

We are therefore writing to register our continued objection to the Policy 26 Blackwell Farm site allocation. Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1. 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]
2. 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
3. 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]
4. adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

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

Attached documents:

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Comment ID: pslp172/3614  Respondent: 17419617 / Janice Pickford  Agent: 17419617 / Janice Pickford

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

Directs more office space to an extended business park (policy E4) which will increase peak time congestion and encourage rat-running through residential areas which is already a major problem. 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 exceeds safe EU limits for Nitrous Oxide.

Disregards an independent landscape study which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review (4.3.8)

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

Guildford Borough Councillors were elected on the promise that they would protect the Green Belt. Instead that promise is being sacrificed for financial gain for the University of Surrey and Guildford Borough Council (in the form of the Government’s New Homes Bonus) by including Blackwell Farm as a development site to extend the Surrey Research Park (Policy E4) and build 1,800 houses, a school, medical centre, etc. However, the cost to residents, businesses, the viability of Guildford town and the environment will be very high.

The University has reneged on its promise to supply student accommodation on its own campuses which would free up a proportion of less expensive housing in the town, occupied by students. The Council would benefit from the additional Council Tax income for many years from private individuals; no Council Tax is paid by students.

Development of the Blackwell Farm site will significantly add to the peak time traffic congestion on the A31 and A3 and ignores independent expert traffic studies on the viability of the development (2.14a). Adding a new link road will add to the traffic chaos for commuters which already exists on the A31 and A3 and add to the congestion at the Tesco/Royal Surrey County Hospital roundabout. In the event of a major incident access to the Hospital for ambulances would be severely affected. It is already difficult for patients trying to meet hospital appointment times with the traffic congestion.

Accidents are caused by drivers trying to cut in from the fast lane on the A31 into the lane accessing the A3 when frustrated by delays. There is no hard shoulder on the A31 or A3 as a refuge for drivers or access by emergency vehicles.

Weight should be given to complying with safe European Union limits on the increased air pollution caused by the additional traffic needing access to the development site; the suggestion that employees at the Hospital and the Research Park would be provided with local housing is flawed as the housing would not be affordable, especially for nursing staff.

The air pollution is already evident, especially at peak times when traffic is virtually stationary for many miles along the Hog’s Back; we can see the fumes rolling down the north side of the Hog’s Back; it is worse in winter conditions. The proposed new major route would cut through a belt of ancient woodland and remnants of historic parkland and disrupt wildlife and habitat. The development would affect the European Union’s Thames Basin Heath Special Protection Area for birds such as the Dartford Warbler and Nightjar. There will be significant light pollution in the area.

The proposed development will result in large scale loss of Green Belt, cause irrevocable harm to this beautiful landscape on the edge of the Surrey Hills Area of Outstanding Natural Beauty, contrary to the Government’s intention to protect Green Belt and disregards an independent expert landscape study which demonstrates that part of the site merits AONB status following Natural England’s forthcoming boundary review (para. 4.3.8). When applying for planning approval on Manor Farm, the University advanced an argument that planning should be approved under “exceptional/special circumstances”. It is questionable what “exception/special circumstances” the University would apply to have approval for Blackwell Farm to be removed from Green Belt. Its marketing strategy is to create a “new garden neighbourhood for West Guildford”; it is hard to see how removing such a beautiful landscape will be improved by building on it.
Residents of properties along the Hog’s Back have no provision for safe access/egress on to the A31 with a speed limit of 60 m.p.h. Similarly the latest draft of the Local Plan also removes the provision for an alternative access to Beechcroft Drive and Manor Cottages. The junction is dangerous to all drivers travelling on the A3 and the residents of Beechcroft Drive. I object to the removal of this scheme (SRN6) on safety grounds.

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

Attached documents:

Comment ID: pslp172/3784  Respondent: 17427105 / E Richings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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

I object to Blackwell Farm being included in this Plan as a development site (Policy A26 & Paragraph 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 which would only add to the current serious congestion of traffic in the area of the A3 and A31 and will affect existing residential areas. Currently in the morning peak traffic period there is severe congestion. This hospital is a Major Incident hospital and fast access must be maintained at all times.

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 (2.1.4a)

Adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

In 2015 the National Farmers’ Union expressed alarm that our ability to produce our own food and be self-sufficient had dropped from 80% in 1980 to 62%. This will drop to 53% by 2040. As world population grows there is no way that we should be building on good quality farm land. Especially commercial property. A recipe for disaster. Again you must listen to us.

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 A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2.1 Policy A26 in the Draft Local Plan 2017 provides for development at Blackwell Farm on the Hogs Back, Guildford. The allocation is still a residential led mixed use development outlined to provide for 1,800 homes but with a minimum of 1,500 homes to be delivered within the Plan period. The employment land is reduced by 1,000sqm to 30,000sqm, which will still form a 10-11ha extension to the west of the current Research Park.

2.2 The allocation would also still provide a range of other ancillary uses including a two-form entry primary school, retail units across the A use class and D1 community buildings but will now also need to provide a secondary school of up to six-form entry of which two forms are needed to serve the housing on the site.

4.1 The transport infrastructure requirements outlined for Policy A26 within the Draft Local Plan 2017 are outlined below with the corresponding cost estimate in italics from the Infrastructure Schedule in Appendix C of the GBC Draft Local Plan 2017.

i) Vehicular access to the site allocation will be via the existing or a realigned junction of the A31 and Down Place access road which will be signalised, and from the site to Egerton Road, preferably Gill Avenue (LRN2 - £5 million and LRN 3 - £5 million).

ii) The design of the improved Down Place access road will be sympathetic to its setting;

iii) A through vehicular link which will be controlled is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route for employees and emergency services to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital, as well as a choice of vehicular access for the new residents/occupiers. This will reduce impact on the A31/A3 junction, in advance of the delivery of Highways England’s A3 Guildford scheme (LRN4 - £20 million);

iv) Developer to provide the western route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the western route section on the Local Road Network, both having regard to the Sustainable Movement Corridor Supplementary Planning Document (SMC1 – proportion of £20 million);

v) A significant bus network to serve the site and key destinations including the existing western suburbs of Guildford and the town centre. (BT6 – £TBC)

vi) Necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station (NR2 – proportion of £10 million);

vii) Interventions which address the potential highway performance issues which could otherwise result from the development (LRN5 £5-10 million).

4.2 Compared to the same list of infrastructure which was provided last year in the previous iteration of the Local Plan there has been an increase in the level of transport infrastructure requirements which the site must provide, namely in the form of the bus network as per scheme BT6 relating to the Sustainable Movement Corridor.

4.3 The transport infrastructure costs associated with the site outlined above now amount to £70-£80 million to deliver just 1,500 residential units in the Plan period (1,800 in total) and 30,000sqm of commercial mixed-use development. The proportionate level of contribution towards the Guildford West (Park Barn) railway station and the western route section on the Local Road Network are as yet unknown at this early stage.

4.4 However, the Blackwell Farm site is the only development site in the Guildford urban area which has the specific written requirement to contribute to the new Park Barn station and since it is indicated as being solely developer funded in the Infrastructure Strategy (Appendix C) of the Draft Local Plan 2017 it is assumed that the Blackwell Farm allocation would need to contribute a significant proportion of the £10 million cost. The western section of the Sustainable Movement Corridor is also only noted on the requirements list for the Blackwell Farm allocation although there is money available through the Local Growth Fund to contribute to this, therefore it is estimated that the obligation would be circa 50% of the total cost of this scheme. This would make the total transport contributions for the Blackwell Farm development around £60 million.
4.5 Concern is therefore raised that the level of transport infrastructure costs which the Blackwell Farm site is required to deliver (~£35,000 per unit) as well as the new secondary school on top of the numerous other costs of infrastructure mitigation is disproportionate to the size of the allocation and brings into question the deliverability and financial viability of the allocation in the Local Plan period contrary to Paragraph 173 of the National Planning Policy Framework (NPPF) as previously discussed in RGP’s previous report TN01 (June 2016).

‘Through vehicular link’ between A31 and Gill Avenue

4.6 Policy A26 now states that the through vehicular route between the A31 Farnham Road and Egerton Road will be ‘controlled’ and will be for employees and emergency services to the Surrey Research Park, the University of Surrey’s Manor Park Campus, Royal Surrey County Hospital staff, patients and visitors as well as for residents on the site. This is a significant and wide range of people who will be permitted to use this route. The method of control is an integral part to the deliverability of the whole site allocation to ensure that it is not used by ‘rat-running’ traffic avoiding the A31/A3 junction and this is a concern that was previously highlighted in RGP’s TN01 (June 2016).

4.7 SCC has indicated that ANPR cameras will be the preferred method of control for the vehicular link road. RGP has looked into the use of ANPR cameras to carry out this type of enforcement and a scheme in Cambridge is known to exist at the Cambridge Biomedical Hospital to deter rat-running vehicles attempting to avoid congestion between the M11 and central Cambridge.

4.8 It is understood that the Cambridge scheme consists of cameras positioned at each of the 4 access points to the Hospital site and the system is based on the time period that cars are recorded as taking between any 2 of the 4 cameras.

4.9 If the duration of stay that the ANPR cameras record associated with any car is below a set period of time which would accord with a ‘through traffic’ speed then the system assumes they were using the Hospital roads as a short-cut and they are charged a fine of £50. If there is a longer dwell time then it is assumed that the cars are legitimate patients/visitors to the Hospital and therefore no fine is issued; additionally, the staff that work in the Hospital are registered on the system so that they do not get fined.

4.10 The roads are understood to be privately owned by the hospital estate and the cameras are owned by the site’s private parking contractor, however, the fines are enforced by Cambridgeshire Police.

4.11 This is a small-scale example of the type of system that would need to be implemented on the Blackwell Farm link road, but with it raises a series of questions related to site deliverability such as:

i) Will the developer provide for the financial enforcement costs of the link road restrictions for the lifetime of the road i.e. in perpetuity? Is this included within the £20million cost for LRN4?

ii) Will Surrey Police be expected to provide the enforcement of the ANPR in perpetuity for the lifetime of the road?

iii) How will all of the people who will be granted access to use the road (residents, University staff and students, Research Park employees, Royal Surrey County Hospital staff, patients and visitors) be able to be differentiated from through traffic?

4.12 Whilst these are operational questions and could be considered as relevant for discussions during a future planning application, they are also considered fundamental to the successful deliverability of the vehicular link road and ensuring that it does not become an attractive ‘rat-run’ for through traffic between the A31 and the A3, but still delivers the aim of being a link road to serve all of the desired uses.

4.13 As discussed in further detail in RGP’s TN01 (June 2016), the implications on the A31 Down Place junction and the Egerton Road junctions of all-purpose through traffic using this route have not been modelled in the strategic model and it is imperative that the link road restrictions operate successfully to ensure that other junctions are not adversely impacted.

EGERTON ROAD AND SURROUNDING AREA

5.1 The Egerton Road Roundabout and the Egerton Road/Gill Avenue junctions are forecast to experience an increase in vehicular traffic which would push the ratio of flow to capacity over actual capacity based on the SHAR 2016 report.
This assessment is not understood to have included any specific assessment associated with the new station at Park Barn or any impact associated with the new secondary school on the Blackwell Farm site.

5.2 It is accepted that the SCC strategic model cannot model specific junction impact as accurately as microsimulation models such as LinSig and Junctions 8 and it is further acknowledged that this detail is not necessary for the high-level assessment required for a Local Plan. However, the true quantum of flows forecast to be generated by all of the Draft Local Plan 2017 aspirations should be incorporated to allow consideration of detailed mitigation to commence.

5.3 The Sustainable Movement Corridor (SMC) Update published in February 2017 by GBC identifies that mitigation options are already being considered for providing additional capacity at the Egerton Road Roundabout and its junction with the A3. The process of considering detailed mitigation to inform the strategic allocations is supported and welcomed, but concern is raised that the options are being considered without the traffic impacts from the Park Barn station and the new secondary school being incorporated.

5.4 The new Park Barn station southern access for instance will likely take its primary access from the western side of Egerton Road to the east of the Hospital. The position of this access will likely result in an increased demand on right turning vehicles at the Egerton Road/Gill Avenue signal controlled junction. Increased provision for right turning vehicles in this location will consequently reduce the capacity of the junction for other movements which may well impact on the new designs for the Egerton Road Roundabout, the SMC and the wider local highway network.

5.5 Additionally, the provision of a new secondary school on the Blackwell Farm site (relocated from the Land to south of Normandy and north of Flexford site allocation [previous Policy A46] which has been removed in its entirety) will ultimately draw vehicular traffic through the Egerton Road junctions. The Blackwell Farm allocation (Policy A26) wording states that the new secondary school would be ‘up to six form entry of which two forms are needed for the housing on the site and the remainder for the wider area’. This indicates that two-thirds of the secondary school children attending the new school will come from off-site. Assuming that there are 30 children per form, 6 forms per year and 5 years in the school (i.e. Years 7-11) there would be a 900 student capacity at the school of which 600 students would need to commute in from outside the Blackwell Farm site each day.

5.6 Whilst the Sustainable Movement Corridor proposals and the new Park Barn station will undoubtedly assist some school pupils and staff in travelling to the new secondary school sustainably from other parts of the borough, there will still ultimately be a draw of vehicles through the Egerton Road junctions to the secondary school, particularly during the morning peak period, which has not been considered.

6.1 The Draft Local Plan 2017 has addressed some of the points which RGP raised in the previous Technical Note in June 2016, however there is still concern regarding the deliverability and viability of the Blackwell Farm allocation (Policy A26) for the following reasons:

i) The required transport infrastructure requirements of around £60 million to make the site acceptable are considered to be excessive in comparison to the scale of the development proposals and the viability and deliverability of the site are still questioned. Compliance with paragraph 173 of the NPPF is also raised;

ii) There are still operational concerns regarding how the through vehicle link will be controlled and how the enforcement will be carried out, by whom and whether it can effectively remove potential for ‘rat-running’ between the A31 and the A3 given the wide range of permitted users of the road;

iii) The deliverability of the scheme still requires third party land to access Gill Avenue and it has not been demonstrated that this is possible to acquire;

iv) The vehicular impact resulting from the requirement to now provide a six-form entry secondary school on the site whereby two thirds of the children would travel in from outside the Blackwell Farm site has not been included in the strategic traffic model and is not understood to be accounted for in the current Egerton Road detailed layout designs.

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 have viewed the previous Local Plan and current, although there has been a few minor changes to the proposal for Blackwell Farm /University Manor farm/Hogs Back area the current proposal is still in excess of what the road infrastructure and amenities can support. This year has seen an increase in the regular road incidents from the Hogs Back to Cathedral junction on the A3. The volume of traffic attempting enter the business park, Royal Surrey Hospital and university campus has grown dramatically in the past few years. This week whilst in term time has seen Madrid Road from Guildford Station through to past Tesco’s’ roundabout at a standstill. Made worse by the temporary closure of a road at the traffic lights forcing volume to travel by single carriageway. It is along these routes the proposed development at Manor Farm is shown to travel to and from the development, university, Royal Surrey Hospital and Guildford and beyond.

The proposed alterations with new access from Hogs Back will destroy open space and wildlife habitat not to mention an area of outstanding chalk land. For those who live in Onslow Village the pollution will increase as the warm air rises from the lower plain new town, noise levels which are on the increase from the A3 will multiply which will drastically affect the quality of life in the village. Recent decision by Guildford Borough Council to refuse planning approval for new homes and school at Rokers was reported by planning offices as “the application site is located within the green belt where there is a general presumption against inappropriate development “. The application proposes a large scale residential development and a new school both are inappropriate developments Inappropriate developments should only be approved where there are very special circumstances which clearly outweigh the harm that would be caused by the development “ the report goes on to say “In addition to the harm to the green belt the report identifies significant harm to the character of the area “ Those comments are even more applicable to Blackwell Farm/Hogs back.

When we moved to Guildford 11 years ago the traffic on the A3 would generally be noticed about 6:30 am now there is only respite between about 1 am to 4:00 am. Any development should only commence when road infrastructure and if approved rail improvements are completed. The Park & Ride at the Surrey Sports Park is under used, limited number of road users will divert off the A3 and use the facility. The greater number of cars and delivery vehicles using the single carriageway road will have a big impact on ambulances trying to arrive and depart Royal Surrey Hospital. With increase in commercial premises there will also be a greater number of delivery lorries travelling on the lacking road infrastructure. Many expensive studies have recently been undertaken without achieving a workable solution for the A3 or town centre gyratory.

With the increase volume of traffic on the Hogs Back/A3 many drivers now use Onslow Village as a rat run leaving at High View Road or the Chase travelling at speed through residential areas with infants and junior schools located in the village. Resulting in deterioration of the public highway especially in Manor Road. Should development proceed this situation will only get worse.

The previous Local Plan study of numbers of additional persons and home requirements was found to be inaccurate, the suggested numbers are guess work based on increase in students at Surrey University, possible new businesses based on the manor farm development and growth in current local population wishing to buy homes in the borough. The apparent need for commercial development in my opinion should be concentrated at Slyfield where with the proposed new road structure would reduce large volumes of traffic from the west of Guildford in particular the hospital/university and
already grid locked A3/A31 and Farnham Road. The proposed Slyfield Road links close to the A3 junction Northbound which would divert heavy goods vehicles away from residential areas and Guildford town centre roads.

Surrey University has more than sufficient land to develop for students approvals have yet to be commenced when built would reduce demand for rented property in Guildford making available for local workers and families. The University should be develop their land before any “Developers” bonus from sale of Blackwell Farm is paid into their coffers. Areas such as the open air car parks empty for long periods throughout the year, these car parks could be redeveloped with underground parking to meet demand with student accommodation in blocks of up to 5 storeys high which would not be detrimental to area. Students on site Campus with own facilities result less travel or use the park and ride facility. To develop the sites the University would need to raise commercial funding which apparently they are not prepared to consider as it is expensive and no immediate return. By selling Blackwell Farm as residential development land the value would dramatically increase over farmland, they want their cake and eat it! I appreciate a large number of local residents are employed at the University "more students + greater number of tutors and other employees + more road travel as many will be living in other parts of Guildford but preferring to travel by road for time convenience rather than local transport. The proposed train station is unlikely to reduce dependency on road network due to distance from proposed housing and commercial areas. Will probably benefit hospital staff and patients, although they would first have to travel to their local station and with poor bus services seems unlikely to have large take up.

The land bank already approved by GBC for development the University should be developed before other off campus sites. Surrey University could comfortably develop those locations and increase student accommodation by utilising the open space car parks which are vacant for much of the week and year. By building underground car parks with student accommodation above the land would be put to better use, reduce the volume of traffic and pollution. The University should be asked to seriously consider however there would be the commercial investment required which the University are unlikely to entertain. We believe the University should not be able to increase the number of students recently reported as an increase of 6,00 until they can accommodate students on the various campus, not to the detriment of residents many of whom own their own homes and will see the area West of change for the worse with over development, poor infrastructure and increase noise, pollution and traffic. The change in the environment would not bring any benefits to current residents, we fail to see anything in the Local Draft Plan which enhances the West of Guildford.

The proposed development to the West of Guildford is in excess of what the town requires and with very limited road infrastructure opportunities to dramatically improve the flow through Guildford on the A3 the area of the North Downs will be destroyed. Current problems would not be solved by the planned road layout alterations as the infrastructure is totally inadequate. Despite numerous surveys at great expense no realistic affordable practical proposal has been suggested. Road network must be the key to size of any development at Blackwell Farm. The past two weeks I have found it impossible to travel through Onslow Village to join Madrid Road and head towards A3 the village and surrounding roads grid locked 8:00-9:30 such issues will increase which has an effect on not just myself but others living in the area trying to get to work. Our quality of life has not been considered in the plan which is driven by seeking unsubstantiated annual housing targets.

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

**Attached documents:**
I strongly 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).

The proposal will cause irrevocable harm to the beautiful landscape on the edge of the Surrey Hill Area of Outstanding Natural Beauty and destroy Green Belt.

Any increase in development, extending the University's land at Manor Farm, would be inappropriate building growth on Green Belt and in the wrong place. The scheme, together with the proposed access road to the site, linking Guildford to the A31, will cause additional chaos and traffic congestion on the A31 and A3.

I live on the north side of the A31 Hog's Back. Residents in East Flexford Lane have already been affected by the closure of the gap in the central reservation of the A31 at the East Flexford Lane point. Since the closure in March 2017 residents in East Flexford Lane have been cut off from reaching their homes several times with the A31 eastbound towards Guildford being closed to all traffic and westbound during the re-surfacing work and no alternative route. Residents of Wanborough and Normandy were also affected. Due to the closure the fire services had a longer journey to tackle a recent field fire close to our property with large fields of combustible crops putting properties, residents and crops at risk. Residents had asked for provision for access at the gap for the emergency services to have facilities for such an event. Response times would be even more difficult at peak hours.

No slip roads, acceleration and deceleration lane provision has been made for owners of Properties along the Hog's Back accessing the A31 with traffic travelling in excess of 60 m.p.h. Further increase in traffic will create even more dangers for residents joining traffic at motorway speeds; pedestrians also cross the A31 to access the bus stops. Every weekday morning there is a queue of traffic into Guildford that stretches back for several miles. Adding a junction and proposed access road to the Blackwell Farm site, with proposals for 1,800 houses, a school, medical centre and expansion of the Research Park, will add an extra burden on an already overloaded road system. The impact on the local network and questionable viability of the development (Policy paragraph 2.14a) ignores independent expert traffic studies and common sense.

Already the Tesco roundabout and vital access to the Royal Surrey County Hospital is congested and approval of the University's plans will cause road infrastructure breakdown. The journey to the Hospital for ambulances with patients is already difficult at peak times.

The additional traffic will add to air pollution which already exceeds safe Eurorean Unit limits. When I drive up East Flexford Lane, it is clear to see the fumes rolling off the Hog's Back down the into the fields, especially at morning and evening peak times when traffic is stationary waiting to access the A3. The development will inevitably see the destruction of trees which are the lungs to counter pollution; the new proposed major route would cut through an ancient woodland and remnants of historic parkland.

The University has already covered most of the adjoining Manor Farm with housing, a veterinary centre, sports facilities for international events and an underused Park & Ride.

When the University of Surrey applied to have the Green Belt restriction on Manor Farm removed to enable it to expand its University and Research Park facilities on to this land, it evoked "Special Circumstances". Permission was granted, with assurances from the University to supply the 60% of its student accommodation on its own campuses. Instead the University has failed to implement the Planning Permission to build accommodation for students. Such action could release up to 1,700 local houses to meet local demands.

The University acquired planning permission for accommodation for students in Walnut Tree Close. This site could have provided housing for people working in central Guildford or using the train station, reducing car dependent travel.

The National Planning Policy Framework guidelines make clear the direction that should be followed on Green Belt protection and sustainability. Guildford Borough Council should adhere to this Policy and not approve development on Blackwell Farm for financial gain in the form of the Government's New Homes Bonus. Consideration should also be given to the loss of food production from Blackwell Farm which presently contributes to Britain's self sufficiency.

I trust councillors will honour their election promises and protect the Green Belt at Blackwell Farm by opposing plans to build on it.
We 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 sites 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
- 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 for Nitrous Oxide.

1. The ESFA supports the clarification of requirements regarding secondary school provision in policies A25 and A26; and the clarification of requirements for developer contributions towards education provision in policy A29.
I object in the strongest possible terms to the following policies within the Draft Local Plan:

Policy A22 - Land North of Keens Lane

Policy A26 - Blackwell Farm

I do not believe that constraints have been properly applied to the Draft Local Plan in terms of the AONB, SPA/SSSI of Whitmoor Common, Green Belt, transport implications, flooding from surface water, lack of infrastructure, vehicular emissions and the proposed use of high grade agricultural land in accordance with paragraphs 112, 119 and 166 of the NPPF.

The SHMA numbers used by G L Hearn appear to be inflated due to discrepancies in the student numbers. This vital piece of the Evidence base appears to be fundamentally flawed.

Guildford is being targeted as a growth hub, but due to the town's topography and the numerous planning constraints which should, but have not been applied, I do not consider the proposed plan to be sound.

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

Attached documents:

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>40905</td>
<td>Blackwell Farm, Hogs Back, Guildford</td>
<td>The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work with Thames Water early on in the planning process to understand what water infrastructure is required to support the development.</td>
<td>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning department.</td>
</tr>
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</table>
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Comment ID: pslp172/4785  Respondent: 17497537 / Margaret Older  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4791  Respondent: 17497601 / I Rose  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4792  Respondent: 17497633 / Michael Fields  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4793  Respondent: 17497665 / Janet Baldwill  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4799  Respondent: 17497761 / Lillian Barratt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/4808  Respondent: 17497793 / Mike & Fiona Sandford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4811  Respondent: 17497825 / S Powell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4829  Respondent: 17497953 / Jillian Hill  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  
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Comment ID: pslp172/4834  Respondent: 17497985 / Carol Hawes  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  
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<th>Respondent: 17498113 / Marie Richards</th>
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Comment ID: pslp172/4859  Respondent: 17498241 / Anne Dealon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4863  Respondent: 17498273 / Joe Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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<th>Respondent: 17498433 / Valerie &amp; George Chant</th>
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Comment ID: pslp172/4879  Respondent: 17498561 / Dominic Lawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4880  Respondent: 17498593 / Patricia Perrin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4890  Respondent: 17498849 / Frank Thorpe  Agent:

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Comment ID: pslp172/4891  Respondent: 17498881 / Colin Hales  Agent:

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

Attached documents:

Comment ID: pslp172/4898  Respondent: 17499073 / Kate Moseley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/4899  Respondent: 17499105 / Wendy Foster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4900  Respondent: 17499169 / Jack Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4901  Respondent: 17499233 / Robin Rose  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
Comment ID: pslp172/4903  Respondent: 17499265 / Margaret Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4902  Respondent: 17499297 / Emily Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4911  Respondent: 17499329 / alex Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4916  Respondent: 17499361 / Kathleen Coleman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4919  Respondent: 17499393 / Yvonne Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4920  Respondent: 17499489 / Ellen Carol Babbs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4921  Respondent: 17499521 / Sebastien Sim  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4926  Respondent: 17499649 / A Tomkins  Agent:

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Attached documents:

Comment ID: pslp172/4927  Respondent: 17499681 / Marion May  Agent:

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Attached documents:

Comment ID: pslp172/4936  Respondent: 17499905 / Sarah Jane Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/4937  Respondent: 17499937 / Alan Pain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4949  Respondent: 17500193 / Penelope Floyd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4954  Respondent: 17500257 / Neville McGarrigle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4957  Respondent: 17500545 / S Hayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4960  Respondent: 17500577 / basil minor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4968  Respondent: 17500801 / Maha Al-Hasani  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/4969  Respondent: 17500865 / A Ridby-Hopper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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| Comment ID: | pslp172/4978 | Respondent: | 17501217 / Sarah Russell | Agent: |
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| Comment ID: | pslp172/4979 | Respondent: | 17501281 / Cameron Lee | Agent: |
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Comment ID: pslp172/4985  Respondent: 17501537 / J. Haskell  Agent:

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Comment ID: pslp172/4988  Respondent: 17501569 / David Banks  Agent:

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Comment ID: pslp172/5002  Respondent: 17502273 / L Scott  Agent:

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Attached documents:

Comment ID: pslp172/5004  Respondent: 17502305 / Allen Davey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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: pslp172/5012  Respondent: 17503137 / Susan Saxby  Agent:

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Comment ID: pslp172/5013  Respondent: 17503169 / Keith Smith  Agent:

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Comment ID: pslp172/5049  Respondent: 17507073 / Philip Haigh  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5050  Respondent: 17507137 / Wendy Wythe  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5051  Respondent: 17507201 / Michael Pitson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5052  Respondent: 17507233 / Veronica Bowen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5056  Respondent: 17507425 / Laurence Greig  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5066  Respondent: 17507841 / Chloe Greene  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5075  Respondent: 17508289 / M. Bray-Brook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:
Comment ID: pslp172/5087  Respondent: 17508833 / Caroline Burnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5088  Respondent: 17508929 / Thomas Parsons  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5089  Respondent: 17508961 / Margaret Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5090  Respondent: 17508993 / C Porteous  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Comment ID: pslp172/5091  Respondent: 17509057 / Duncan Foster  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
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Comment ID: pslp172/5092  Respondent: 17509153 / Michael Collins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5093  Respondent: 17509185 / Justine Charman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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| Comment ID: | pslp172/5094 | Respondent: | 17509249 / Roward Jorris | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
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| Comment ID: | pslp172/5097 | Respondent: | 17509313 / Christine Haigh | Agent: |
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| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
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| Comment ID: | pslp172/5098 | Respondent: | 17509409 / L McGregor | Agent: |
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Comment ID: pslp172/5099  Respondent: 17509441 / Leslie Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5104  Respondent: 17524385 / Harold Coleman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5105  Respondent: 17524417 / Michael Laurence Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5106  Respondent: 17524449 / Audrey Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5110  Respondent: 17524673 / M. A Paige  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5111  Respondent: 17524737 / Terence Flynn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5115  Respondent: 17524801 / Roger Francis Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5117  Respondent: 17524865 / Louise Jones  Agent: Rachel Pengelly

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5121  Respondent: 17524993 / J Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: pslp172/5122  Respondent: 17525025 / Beverley Fried  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5123  Respondent: 17525057 / Ian Paley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Comment ID: pslp172/5124  Respondent: 17525089 / Bryan Foad  Agent:

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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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<table>
<thead>
<tr>
<th>Comment ID: pslp172/5162</th>
<th>Respondent: 17527041 / S Mitchell</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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We 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 sites 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
- 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 for Nitrous Oxide.

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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: A59 - New rail station at Guildford West (Park Barn)
Save Hogs Back supports this railway station in principle, irrespective of the Blackwell Farm development. It is important to appreciate that its contribution within the Local Plan period will be limited, probably not being operational until at least 2029. The Topic Paper: Transport explains at paragraph 5.31 that Guildford West (Park Barn) railway station is likely to be brought forward only in 2024-2029 because “August 2024 corresponds with the anticipated start date of the South Western franchise period subsequent to the recently awarded franchise for the 2017-2024 period. Delivery from or subsequent to 2024 allows for the servicing of the new rail stations to be included within that new South Western franchise covering the period from 2024”. On this basis, progress with the construction of a station is feasible but far from assured. In particular, although the Plan recognises the need to deliver the project by working with Network Rail, there is no indication in the Plan that Network Rail has identified the technical feasibility and cost of the project or formally committed to it. It may simply not be in a position to deliver this project.

The new railway station will create a new destination for traffic. On the south side of the railway line, behind the hospitals, there will be a requirement for disabled parking together with access for buses, taxis and passenger drop-off. This will add to the congestion on local roads, notably Egerton Road. However, the anticipated vehicle activity associated with the new station has not been included in the traffic model for the area, and this needs to be rectified urgently. This is yet another contributor to excess congestion on Egerton Road if the Blackwell Farm development were to proceed.

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

Attached documents:
Policy A59 – new station at Park Barn – it is excellent now to see specific policy relating to this, but there is some local resident concern about how kiss and ride’ provision only will be managed; not providing car parking does not prevent train users arriving by car and seeking somewhere to park.

I congratulate Guildford Borough Council on amending the Local Plan to reflect local concerns and the continuing positive approach to the future of Guildford. We need more homes. We must drive developers and those that own land to maximise brownfield development and thus to protect the countryside as far as possible.

I will continue to lobby Government strongly for vital investment in infrastructure as, without this money, the number of homes we can build will be constrained.

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

**Attached documents:**

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**Comment ID:** pslp172/4001  **Respondent:** 8729217 / Karen Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

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

I support the proposal for a new rail station at Park Barn. However, its delivery remains uncertain for the following reasons:

- There is no evidence accompanying this version of the plan that Network Rail has approved the scheme.
- The economic viability of operating such a station has not been demonstrated and it is unclear whether there is passenger demand for the train service offered on this line.
- The policy does not allocate land for taxis, buses, disabled parking and ‘kiss and ride’ (Requirement 3), and it is not confirmed that the Royal Surrey County Hospital estate would be prepared to provide this land.
- The station is located within a severely congested corner of Guildford, and the traffic generated by trips to and from this new station has not been included within the peak-hour modelling.
- The cost of the new station (£10m) will be met by the developer. This, again, would add to the already unacceptable infrastructure burden placed on the developer of Blackwell Farm and there is a risk that it would not fulfil all its infrastructure commitments (contrary to NPPF Para 173).
- There are likely to be much greater benefits for travellers in Guildford as a whole if £10m was spent on other transport schemes, such as providing safe access/egress for Beechcroft Drive, or a bus service targeted at all school-aged children.

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

**Attached documents:**

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**Comment ID:** pslp172/2574  **Respondent:** 8729313 / Lisa Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

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

I am concerned with the traffic impact in Park Barn, Worplesdon and the areas around the hospital with the increased car journeys to drop off and collect travellers at the new station.
I am also concerned that Park Barn will become one large parking area.

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

Attached documents:

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Comment ID: pslp172/3409  Respondent: 9332193 / Save the Hogs Back Campaign  Agent: Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

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

Save Hogs Back supports this railway station in principle, irrespective of the Blackwell Farm development. It is important to appreciate that its contribution within the Local Plan period will be limited, probably not being operational until at least 2029. The Topic Paper: Transport explains at paragraph 5.31 that Guildford West (Park Barn) railway station is likely to be brought forward only in 2024-2029 because “August 2024 corresponds with the anticipated start date of the South Western franchise period subsequent to the recently awarded franchise for the 2017-2024 period. Delivery from or subsequent to 2024 allows for the servicing of the new rail stations to be included within that new South Western franchise covering the period from 2024”. On this basis, progress with the construction of a station is feasible but far from assured. In particular, although the Plan recognises the need to deliver the project by working with Network Rail, there is no indication in the Plan that Network Rail has identified the technical feasibility and cost of the project or formally committed to it. It may simply not be in a position to deliver this project.

The new railway station will create a new destination for traffic. On the south side of the railway line, behind the hospitals, there will be a requirement for disabled parking together with access for buses, taxis and passenger drop-off. This will add to the congestion on local roads, notably Egerton Road. However, the anticipated vehicle activity associated with the new station has not been included in the traffic model for the area, and this needs to be rectified urgently. This is yet another contributor to excess congestion on Egerton Road if the Blackwell Farm development were to proceed.

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

Attached documents:

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Comment ID: pslp172/3354  Respondent: 10958337 / David Wright  Agent: Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

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

Whilst I broadly support the inclusion of the new station I would like to see some commitment that the inclusion of this station on the North Downs line will not lead to a reduced service for Wanborough station.

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

Attached documents:

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Comment ID: pslp172/2602  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent: Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Save Hogs Back supports this railway station in principle, irrespective of the Blackwell Farm development. It is important to appreciate that its contribution within the Local Plan period will be limited, probably not being operational until at least 2029. The Topic Paper: Transport explains at paragraph 5.31 that Guildford West (Park Barn) railway station is likely to be brought forward only in 2024-2029 because “August 2024 corresponds with the anticipated start date of the South Western franchise period subsequent to the recently awarded franchise for the 2017-2024 period. Delivery from or subsequent to 2024 allows for the servicing of the new rail stations to be included within that new South Western franchise covering the period from 2024”. On this basis, progress with the construction of a station is feasible but far from assured. In particular, although the Plan recognises the need to deliver the project by working with Network Rail, there is no indication in the Plan that Network Rail has identified the technical feasibility and cost of the project or formally committed to it. It may simply not be in a position to deliver this project.

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

Attached documents:

Comment ID: pslp172/4317  
Respondent: 15460737 / Donna Collinson  
Agent: 

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

Policy A59 new rail station at Guildford West. The addition of this policy is supported.

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

Attached documents:

Comment ID: pslp172/1746  
Respondent: 17285857 / Network Rail (Daniel Chalk)  
Agent: 

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

Policy A59: New Rail Station at Guildford West (Park Barn)

Network Rail have worked closely with Guildford Borough Council and other interested parties on a potential station within this site allocation. A GRIP 2 study was commissioned by Guildford Borough Council that has looked at a location within this site and one within Policy A26 as potential new station locations.

We will therefore continue to work with the proposer of the new station as required and necessary to ensure that railway requirements are taken account of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY A59: New rail station at Guildford West (Park Barn)

The University supports this new policy in principle. This new rail station is an important element of the local plan strategy.

However, we note that it does not allocate land for the south side facility for taxis, buses, disabled parking and ‘kiss and ride’ referred to in the policy, nor the southern connection to the local road network. This calls into question its deliverability.

The plan should provide more information on how this will be delivered.

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

See above text.

Attached documents:

POLICY A59 - New rail station at Guildford West (Park Barn)

4.39 GVG supports the use of this site for a new railway station. In order to encourage modal shift it is important that the town centre sites around Guildford Train Station accommodate the new platforms and infrastructure to allow for an increase in domestic rail services to this station from the town centre.

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

Attached documents:

Comment ID: pslp172/3975  Respondent: 17440545 / Compton and Worplesdon Parish Council  Agent: RGP-Transport Planning & Infrastructure (Neil Rowe)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
3.1 An Addendum report to the original ‘Guildford Borough Council Proposed Submission Local Plan 2016: Strategic Highway Assessment Report’ (SHAR) (June 2016) has been produced by GBC which it states that the Addendum:

‘provides a high level review of the potential changes to traffic impacts from those reported in the SHAR 2016 which are expected as a result of the key changes made to proposed site policies and to the programme of transport schemes as identified in the Draft Local Plan 2017’.

3.2 The key changes are outlined in Table 2 of the document where on the final page it acknowledges the new Policy A59: New Rail station at Guildford West (Park Barn) as a key change to the Draft Local Plan 2017 and states:

‘It is expected that, borough-wide, modal shift of car to rail trips will significantly outweigh new vehicle trips to access the new rail station. The station is not planned to be a parkway station so sustainable transport options for travel to and from the site will be a priority.’

3.3 It is acknowledged that locating a new station adjacent to existing (Park Barn) and proposed (Blackwell Farm) housing settlements as well as the Royal Surrey County Hospital, Surrey University and Surrey Research Park is a very positive move in terms of encouraging sustained modal shift from the private car for regular journeys such as commuting and indeed for short trips to and from Guildford town centre. It is however a concern that the actual vehicle activity associated with the new station has not been specifically included in the strategic model.

3.4 The assumption by GBC that the current traffic modelling completed in 2016 represents a ‘worst case’ as the traffic levels will reduce borough-wide due to modal shift is misleading since the zones on the network which include and adjoin the new station are likely to experience an increase in vehicular traffic. As well as a likely increase in vehicular traffic, there would also be an associated change in vehicle routing dynamics on the overall network as vehicles access it and this has not been taken into account.

3.5 Despite it not being a ‘parkway’ style station with parking provided (other than disabled parking), the new station will still generate the need for vehicular access from taxis, buses and ‘kiss and ride’ facilities (i.e. drop off from private cars) as outlined in the policy requirements for the allocation. It is accepted that overall there could well be a borough-wide modal shift to using rail for shorter trips which is welcomed and supported, but the concentration of traffic at the proposed access points north and south of the new station is a cause for concern given the congested nature of the local road network.

3.6 The absence of strategic modelling associated of the transport impacts on local infrastructure close to the new station considering the close proximity of the A3 and Egerton Road junctions is a concern. The proposed highway improvements to address capacity issues at these junctions as a result of existing and forecast traffic conditions could result in the current work not providing sufficient capacity to accommodate the immediate impact of the trips attracted to the new station from buses, taxis and private cars.

3.7 With regard to deliverability of the station there is a concern. The Inspector should ensure that Network Rail is satisfied that a new station is technically deliverable and that the costs assumed within the Draft Local Plan 2017 are appropriate. RGP is not aware whether such a statement has been made by Network Rail at the time of writing.

6.2 In relation to the New Rail Station at Guildford West (Park Barn) (Policy A59) the following concerns are raised:

i) The vehicular impact of the Park Barn station on the Egerton Road area has not been included within the strategic traffic model, therefore the true impacts of the scheme are not understood to be included within the detailed mitigation currently being considered;

ii) The deliverability of the station is heavily reliant upon Network Rail and RGP is not aware that Network Rail is in a position to deliver the station within the lifetime of the Local Plan so that the expected modal shift is achievable for all of the reliant development primarily on the Blackwell Farm development.

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

Attached documents: 226389 - Sketch drawing ‘Initial Junction Arrangement’ provided by University of ....pdf (210 KB)
Total records: 13.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: A27 - Warren Farm, White Lane, Ash Green, Guildford
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPS16/4181  Respondent: 8933185 / Peter See  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A27
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 186, Policy A27: Warren Farm, White Lane, Ash Green

Objection -There will be too many homes (approx. 58). Density will be too high.

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

Attached documents:

Comment ID: pslp172/450  Respondent: 8933185 / Peter See  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A27
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 208, Policy A27: Warren Farm, White Lane, Ash Green

Objection – There will be too many homes (approx. 58). Density will be too high.

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

Attached documents:

Comment ID: PSLPS16/661  Respondent: 15225857 / BlackOnyx Developments limited  Agent: AECOM (Philip Scott)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A27
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

PROPOSED SUBMISSION HOUSING ALLOCATION SITE A27 – WARREN FARM, WHITE LANE, ASH GREEN

On behalf of our client, BlackOnyx Guildford Limited, please accept and register these formal representations to the Borough Council’s Proposed Submission Local Plan (Regulation 19) in relation to the Proposed Submission Borough wide Strategy and additionally Proposed Submission Housing Site A27: Warren Farm, White Lane, Ash Green.

These representations confirm our support for the following Proposed Submission policies:

- Proposed Submission Policy S2: Borough Wide Strategy
- Proposed Submission Site A27: Warren Farm, white Lane, Ash Green
Background

BlackOnyx Guildford Limited fully supports the Borough Council’s Submission Local Plan in relation to the proposed allocation of 3.36 hectares of land at Warren Farm, White Lane, Ash Green as set out in Proposed Submission Site Allocation A27. BlackOnyx Guildford Limited has entered into an agreement with the freehold owners of Warren Farm and Surrey House in relation to the proposed submission site and we are able to confirm that site A27 is available and deliverable during the early part of the new Plan period for housing development.

Ash Green is a sustainable settlement to the south east of Ash with excellent access to the strategic highway network including the A31 (south) and A331 (west). The village currently benefits from a bus service to nearby Ash where there are a wide range of local services and amenities. The village itself lies outside of the Green Belt and outside the Area of Outstanding Natural Beauty (‘AONB’) and Area of Great Landscape Value. Furthermore, the proposed submission site and village are not identified as being within a Conservation Area and there are no listed buildings in the immediate vicinity of the proposed submission housing site.

The absence of Green Belt and AONB means that Ash Green is an appropriate spatial location to accommodate modest housing growth as part of the Council’s proposed spatial development strategy which will seek to deliver up to 13,860 new homes across the borough during the plan period in order to meet acute housing need.

In this respect, we note that Proposed Submission Policy S2: Borough Wide Strategy has been informed and developed through a series of evidence based assessments including five volumes of the Green Belt and Countryside Study (‘GBCS’) and various iterations of borough-wide housing need assessment. We note that the Council’s Proposed Submission Policy S2 seeks to distribute housing growth fairly across the borough with a focus towards supporting and creating sustainable settlements. We consider that the Borough Wide Strategy is credible and robust and is in accordance with the aims and objectives of the NPPF.

Extent of Ash Green as shown on the Proposed SubmissionInset Map with Proposed Submission Site A27 Warren Farm shown highlighted in red

Proposed Submission Housing Site A27

The enclosed character of Proposed Submission Housing Site A27 is a result of existing residential development on two sides and mature woodland on the other boundaries means the site can be developed to form a natural extension of the built form of Ash Green. The site is distinctly separate from the open countryside to the south and redevelopment would not impact significantly on the wider countryside and would be consistent with the existing settlement pattern of Ash Green.

Furthermore, proposed submission housing site A27 has no particular landscape, ecological, or heritage value save for the semi natural ancient woodland which borders (but lies outside) the southern boundary of the site. In respect to the woodland, Natural England has confirmed that, provided new housing development incorporates a 15 metre non-development buffer housing development will not cause any detriment to the woodland area.

The principle of residential development on the site has also been considered by an independent Planning Inspector who concluded, ‘There is no dispute between the parties that, in principle, the development of this site would be acceptable’ (ref: APP/Y3615/A/14/2220129 paragraph 30). All that remains to be resolved are matters of detailed design.

It is also highly notable that the Strategic Housing Land Availability Assessment and draft Local Plan (July 2014) have consistently identified and promoted the proposed submission housing site throughout the emerging new Local Plan process.

The extent of Proposed Submission Policy A27: Warren Farm, White Lane, Ash Green as shown in the SHLAA
Deliverable Access

One of the key issues to the delivery of Proposed Submission Site A27 is ensuring that safe vehicular access can be created onto White Lane. In this important respect, we are able to confirm that access arrangements to the Proposed Submission site can be safely delivered via Surrey House and that such an access solution will provide appropriate sight lines and forward vision ensuring highway safety for road users. The approach to the site access reflects the access solution proposed for planning application 16/P/00120 which has been reviewed and assessed by the Surrey County Highway Authority. The Highway Authority has confirmed in writing that it has ‘no objection’ to highway access being formed via Surrey House to serve 58 dwellings.

Other Related Matters

A range of baseline studies have been undertaken to assess the likely impacts of delivering housing development on Proposed Submission housing site A27. Those studies include; transport assessment, planning assessment, flood risk and surface water run-off assessment, land contamination study, and ecological (stage 1 and stage 2) assessments. All the studies carried out, to date, demonstrate that housing development can be delivered on the proposed submission site without causing any significant harm to amenities or the local environment.

Indeed the provision of new housing on Proposed Submission Site A27 will benefit local services and amenities by ensuring that the village caters for housing needs including affordable housing for local people, and retains a healthy mix of people (including young people and families).

Housing Need

Housing delivery in the borough has not kept pace with identified housing need or targets, and consequently the Council cannot currently demonstrate a 5 year supply of housing land. In this respect, it is highly notable that the annual housing Monitoring Report 2014/2015 published in October 2015 acknowledges that the borough has identified just 2.4 years of housing land supply when measured against the required 5 year housing land supply target. The Council needs a real step change in housing land supply and delivery in order to meet local housing need. The lack of sufficient new housing also restricts the ability of the borough’s economy to grow and prosper.

The Council’s sustainable development strategy (Proposed Submission Policy S2: Borough Wide Strategy) identifies that the Council’s preferred approach is to focus future housing growth in the most sustainable locations which the Council identify as:

- Guildford town centre
- Urban areas
- Inset villages
- Identified Green Belt villages

We support the Council’s strategy of focussing housing growth on sustainable settlements and villages. The Council’s development strategy set out in Proposed Submission Policy S2 is clearly in conformity with the aims and objectives contained in the NPPF. In that respect, sustainable, accessible settlements such as Ash Green which are outside of the Green Belt, and not designated as part of the AONB or Area of Great Landscape Value can play an important role as part of the borough’s development strategy and make a meaningful contribution towards accommodating new housing development to meet acute housing need.

The Council’s promotion of Ash Green as a sustainable location for modest housing growth and the promotion of Housing Site A27 in the Proposed Submission Local Plan is appropriate and we strongly support these elements of the emerging Local Plan.

Conclusion
The NPPF advises that villages and sustainable settlements have an important contribution to make in terms of accommodating housing growth in order to help meet acute housing need and to support local economies.

The Council’s emerging new Local Plan and the associated evidence base has consistently identified Site A27 land at Warren Farm, White Lane as a suitable site to deliver new housing. An independent Planning Inspector has also concluded that there is no objection to the principle of housing development on the site, subject to detailed design considerations.

Safe vehicular access is available from White Lane and this has been confirmed in writing by the County Highway Authority in relation to planning application 16/P/00120. There are no objections from statutory parties including Natural England which has confirmed that, provided a 15 metre buffer is safeguarded between proposed housing and the woodland to the south of the Proposed Submission site, it will have no objection to housing development.

We are aware that the annual housing Monitoring Report 2014/2015 published in October 2015 acknowledges that the Council has identified just **2.4 years of housing land supply** when measured against the required 5 year housing land supply target. Proposed Submission Site A27 will make an important contribution towards helping to address this significant shortfall and meeting the acute housing need locally. It will also deliver an element of affordable housing for those most in need.

In light of all of the above, it is clear that the Proposed Submission Housing Site A27 Warren Farm, White Lane, Ash Green is an appropriate housing site allocation. The promotion of site A27 is fully in conformity with the aims and objectives of the NPPF and it will help support the Council’s proposed spatial development strategy set out in Proposed Submission Policy S2.

I would be very grateful if you would confirm that these representations in support of Proposed Submission Policy S2; Borough Wide Strategy, and our support for the Proposed Submission Housing Site A27: Warren Farm, White Lane, Ash Green have been registered and are ‘duly made’.

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

Attached documents:  
- [IMAGE 1 AECOM.png](500 KB)  
- [IMAGE 2 AECOM.png](346 KB)

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**Comment ID:** pslp172/2817  **Respondent:** 15384481 / M J Levers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A27

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

Objection to Policy Numbers A27, A28, A29 and to the map on page 301 (offices) because of lost countryside and amenity, extra traffic, more congestion (entry and exit from Guildford Road, which is already seriously congested daily) more parked cars at local shops, more pollution, more demand for local services.

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

**Attached documents:**

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**Comment ID:** PSLPS16/4441  **Respondent:** 15398817 / Kitewood Estates (Sara Sweeney)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A27

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

Objection to Policy Numbers A27, A28, A29 and to the map on page 301 (offices) because of lost countryside and amenity, extra traffic, more congestion (entry and exit from Guildford Road, which is already seriously congested daily) more parked cars at local shops, more pollution, more demand for local services.

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

**Attached documents:**
Site Context

The 13.8ha site is located to the east of Ash Green and comprises agricultural fields with several blocks of mature tree belts. The site is bounded by residential gardens to the west, and enclosed by trees on the north, eastern and southern boundaries (Refer to the Location Plan at Appendix)

The site is designated Green Belt on the adopted proposals map. The tree belt along the northern and southern boundaries of the site are designated as a Site of Nature Conservation interest.

The site is also located 1.7km from the Thames Heath Basin Special Protection Area, which is also a Site of Special Scientific Interested (SSSI).

The plan at Appendix 2 shows that the site comprises three main parcels which are currently grazed by cattle and sheep.

Proposed Submission Local Plan

The site is not proposed for development In the Proposed Submission Local Plan, nor has it been previously promoted as an available site. However, the site is now available and there are no known constraints that would prevent the site coming forward for development. Parcel 1 (Refer to Appendix 2) is located directly adjacent to the settlement boundary and is contained by woodland to the north, east and south.

We note that the Council proposes that following sites at Ash Green are removed from the Green Belt and allocated for residential development (C3 use):

- POLICY A27: Warren Farm, White Lane, Ash Green (approximately 158 dwellings)
- POLICY A28: Land to the 8Ut of White Lane, Ash Green (approximately 82 dwellings).

Kitewood Estates do not wish to challenge the proposed allocations at Ash Green, albeit we do wish to make the point that the land at Sunnybrook Farm is equally suitable for development and poses the opportunity for ecological enhancements.

Ecology Considerations

Derek Finnie Associates undertook an ecological Phase 1 Assessment of the site in July 2016 (encl. Appendix 3) and concluded;

- Overall the biodiversity value of the Site is of moderate level due to the SNCI designation and the presence of Ancient Woodland; However, the majority of the Site, which supports improved grassland, is of negligible value;
- If SANGS are to be provided In situ, there is likely to be ample opportunity to provide biodiversity improvements without compromising the main objectives of the SANGS. If contributions towards off site SANGS is adopted, then scope would be available within landscaped areas of the Site to provide enhancement of the biodiversity value of the Site (Phase 1 Habitat Assessment (July 2016)).

Guildford Borough Green Belt and Country Side Study

The site is assessed in Land Parcel H18. Land parcel H18 is considered to have high Green Belt sensitivity. The study concluded that the following Green Belt proposes are met by this land;

- Purpose 1: checks the Eastward sprawl of Ash Green; and
- Purpose 3: minimal existing development therefore safeguards the countryside from encroachment.

In the context of the Green Belt purposes, the site is well contained by a dense tree belt on the eastern boundary and therefore acts as a barrier to eastern sprawl.
The development of the site would Inevitably result In Increased built-form In the countryside. However, any scheme could offer the opportunity to deliver new community Infrastructure and help improve accessibility to outdoor recreation. Parcel 1(as identified at Appendix 2) would only represent a slight encroachment on the open countryside and the remainder of the site has various opportunities for biodiversity enhancements. Ultimately the allocation of this site would not undermine the integrity of the countryside.

Development Potential and Deliverability

Land Parcel 1 (identified at Appendix 2) is approximately 4ha (excluding the tree belt) and could comfortably accommodate in the region of 90-120 dwellings.

There are no barriers to the deliverability of the site which would prevent or delay housing coming forward within the short term. The Infrastructure and design requirements associated with the development are relatively minor compared with other strategic sites within the Plan.

Overall, Kitewood Estates suggest that the best approach for the Council to maintain a deliverable five year housing land supply against the up-to-date OAN, is to ensure the release of a range of sites, of varying sizes, in several locations.

If the site is proposed to be removed from the Green Belt and proposed for allocation, we would expect the site to begin delivering houses within the first five years of the Plan, Alternatively, the site could be safeguarded as a future allocation should the housing need increase during the Plan period.

Conclusions

Overall, the plan appears to have been positively prepared in an attempt to fully meet the Council's Identified Objectively Assessed Need. Albeit, the evidence base behind the OAN is out of date and on that basis could be considered unsound.

The land at Sunnybrook Farm, Ash Green has few constraints and offers the opportunity to deliver further dwellings during the Plan period.

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

Attached documents: Kitewood Estates.pdf (605 KB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7143</th>
<th>Respondent: 15629377 / The Woodland Trust (Jack Taylor)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A27</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>is Legally Compliant?</td>
<td>( )</td>
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<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A27</td>
<td>Warren Farm, White Lane, Ash Green</td>
<td>Ash Green</td>
<td>C3, 58 Homes</td>
<td>Adjacent</td>
<td>Unnamed ASNW, SU905492</td>
</tr>
</tbody>
</table>

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

Attached documents:
### Comment ID: PSLPS16/7815  Respondent:  15674273 / Savills for Thames Water (Katherine Jones)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A27

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

This site falls outside of Thames Water’s water supply boundary.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

There is a history of some sewer flooding. Developer funded impact study required to understand implications of development.

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

**Attached documents:**

### Comment ID: pslp172/1294  Respondent:  16209409 / Natural England (Amy Steel)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A27

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

Policy A27: Warren Farm, White Lane, Ash Green

This site is within close proximity to the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.

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

**Attached documents:**

### Comment ID: pslp172/4823  Respondent:  17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A27

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
<table>
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<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
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</thead>
<tbody>
<tr>
<td>42339</td>
<td>A27 - Warren Farm, White Lane, Ash, Guildford, GU12 6HW</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
</tr>
</tbody>
</table>

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

**Attached documents:**

Total records: 9.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: A28 - Land to the east of White Lane, Ash
I wish to comment on the proposed site A28 in the revised draft Local Plan.

1. The address of the site should be "Land to the east of White Lane, Ash Green." This area is and always has been Ash Green, not Ash.
2. The southern boundary has been moved south to include an area of ancient woodland in which every tree is subject to a TPO. Since it is inconceivable that planning permission would be granted for this area of ancient woodland, the southern boundary should remain along the northern edge of the woodland as shown in the previous draft.
3. The western boundary has been moved to the west of White Lane, thereby including the road in the potential development site. It also includes the line of trees along the eastern edge of White Lane. These are also part of the ancient woodland and all the trees in this strip are subject to TPOs. The boundary should remain to the east of this woodland as shown in the previous draft.
4. It is the stated policy in the draft local plan that Ash Green should be protected from the sprawl of the Ash and Tongham Urban Area by the creation of new Green Belt to the North and West of the village. This site violates that Local Plan principle and leave virtually no protection for the village from urban spread from the north.
5. If some development of this site has to take place in should to provide facilities for the village of Ash Green, including a village Hall. It should also be used to provide open space (recreational ground or SANG) for the developments around Ash Manor in site A29.

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

Attached documents:
Correct title of Policy A28 to say Ash Green, and not Ash.

- Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space. Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site.”
- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

Attached documents:

Comment ID: PSLPS16/995  Respondent: 8848033 / Paul Gerrard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A28

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

I object. It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF 119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by NRM6 viii, NPPF 158 and 166.

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

Attached documents:

Comment ID: pslp172/5211  Respondent: 8856769 / Marion Howells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

At all times please be sure we refer to Ash Green in A28 and not Ash.

Policies A27, 28 and 29 refer to growth in Ash Green of 50%. With this growth proposal the village should be provided with some village hall or community centre and recreational area. There is currently no community or social space and too much development will prevent this provision as space will run out. Your plan should also look to provide a mix of homes (C3) and accommodation for older people (C2). The latter is an increasing need as demonstrated by current UK demographic information on our ageing population.

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

Attached documents:

Comment ID: pslp172/3705  Respondent: 8902913 / Jessica Povey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

Correct title of Policy A28 to say Ash Green, and not Ash.
Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

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Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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Correct title of Policy A28 to say Ash Green, and not Ash.

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Attached documents:

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<th>Respondent: 8928097 / Sue Wyeth-Price</th>
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Policy A28: Land to the east of White Lane, Ash Green

Correct the title of Policy A28 to say Ash Green, and not Ash.

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<th>Respondent: 8933185 / Peter See</th>
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</tbody>
</table>
### Page 188. Policy A28: Land to the east of White Lane, Ash Green

**Objection** - There will be too many homes (approx. 62). Density will be too high.

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

**Attached documents:**

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<th>Comment ID: pslp172/4328</th>
<th><strong>Respondent:</strong> 8964929 / C.J. Bannister</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
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<td><strong>Document:</strong></td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
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<tr>
<td><strong>Firstly I am not happy at the fact that the word ‘Green’ of Ash Green was crossed out, even if it was an ‘error’. As part of the Ash Green community it has made me feel like we are worth nothing and our identity can be changed just like that. Well we can’t. We chose to live in ASH GREEN for a reason, because it is beautiful and like the name states ‘GREEN’. It is full of trees, greenery, wildlife. It is not Urban and it is not Ash.</strong></td>
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<td><strong>Attached documents:</strong></td>
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</table>
As residents of Ash Green Road, we have deeds dating back to the early 1900’s with Ash Green clearly documented. The Ash Parish may have dealt with deeds but my legal, binding documents and deeds historically have Ash Green on them. That is because we were and are part of Ash Green.

Where the blue line has been added along the map of the area to draft a separation of Ash Green to ATUA it seems to have put the built up section of Ash GREEN into ‘Ash Green’ and the fields, trees, orchard, old farmsteads, rural part of Ash Green into ASH. It doesn’t make sense. Wouldn’t it make more sense to leave Ash Green as it originally was, a rural community with rural history. As already drafted in the Local Plan it needs to support the rural community. Even on page 213 of the local plan it lists in it’s key considerations ‘The historical location of Ash Green’.

Lets keep it that way, don’t chop it in half. Hundreds of us that live in this community are desperately worried that we will be segregated. It needs a more defining border that incorporates Ash Green Road and Ash Manor.

This objection may have strong undertones in it but the reason for this is, along with all my neighbours and fellow residents of Ash Green, we feel absolutely passionate that where we have been drafted, we should be put back into the original Ash Green. Please don’t separate us. We are a strong community, who love our village. As residents under the Guildford Borough Council, I would feel severely let down if where I live is put into an Urban area.

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

Attached documents:

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Comment ID: pslp172/2974  Respondent: 10818017 / Nigel Draper  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

- Correct title of Policy A28 to say Ash Green, and not Ash.
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Attached documents:

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Comment ID: pslp172/4806  Respondent: 10831745 / Diane Wilsden  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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Comment ID: pslp172/4804  Respondent: 10831841 / S Wilsden  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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<td>Opportunities (1) Should read: . A mix of homes for older people (C2) would be most appropriate for this site.”</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? ( )

OBJECTION

As the current occupiers of Ash Green Station, we feel well based to be able to comment on the rather strange boundaries you have created for Ash Green in the plan. You are proposing that Ash Green Road be included in the Ash and Tongham urban area. Where will the boundary be on A28 as you are proposing development of this site? There will be no boundary between Ash and Ash Green. Ash Green actually starts North of Ash Green Road. We believe the greenbelt boundary should be placed north of Ash Green Road as a minimum.

The amount of proposed development in A28 will detrimentally change the character of the village. Large housing developments are not in keeping with Ash Green and the surrounding area and the density of the development is vastly too high. Ash Green is only suitable for accommodating small scale infill housing. Extending the village by over 20% cannot be classed as small scale infill. Rural Ash Green is not a Strategic Area for Growth, this development threatens turning the area from rural to urban.

As the current owners and guardians of the locally listed, historic building of Ash Green Station, we feel that the historic context would be lost as we would be surrounded by and right in the middle of proposed new housing developments, not in keeping with the village.

According to the NPPF guidelines Ash Green is not a suitable location for sustainable development because it has no shops, doctors, community facilities and it's public transport infrastructure is very poor. Guildford Borough Council’s own Settlement Hierarchy ranks this as the least sustainable location in the borough.

Local schools, doctors and dentists are already under pressure. We currently struggle to get a Doctors appointment within two weeks.

We believe the proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally with the main route through Ash in effect being closed 35 minutes out of every hour at the level crossing causing pinch points. We have eight of the top hotspots for traffic congestion within Surrey in and around Ash. The Hogs Back to Guildford at peak times is extremely congested and would struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major routes out of Aldershot meeting the A323 at Ash), these new developments will put a strain on everything before Guildford Borough Council even start with any of their proposed developments.

Ash Green, Ash and Tongham has a long recorded history of flooding issues and the sewerage system is at full capacity. With the proposed level of development this will do nothing other than exacerbate an already major problem. Our house already suffers the affects from poor water drainage as the railway cutting is used for local surface water drainage. We have serious concerns that major development on this site could lead to further issues regarding flooding.

We believe site A28 is not suitable for development as our house which is as stated earlier on the local list of buildings which are of intrinsic historic interest would be impacted massively by any development on this site. The old station is built into the railway cutting, and as such we only have windows on the south side of the building at ground level, which is level with the old track bed. Any development of A28 would result in loss of light to our property and also mean we would be completely overlooked by properties on this site, we would lose all privacy. We would also have greatly increased noise and disturbance from all the residents and road noise, both within the estate and on White Lane. Where would the proposed entry and egress points be for this site? White Lane would be awkward and dangerous as it has a blind crest on the bridge to the north and a slight curve in the road to the south. Drovers Way is not designed to take this level of traffic. The junction of White Lane, Ash Green Road and Foreman Road has a history of accidents and a development on A28 would potentially add to this problem with increased traffic levels.
We feel it would be an incredible tragedy to lose such a wonderful greenfield site, which once developed, we would never get back, for us, or future generations. Under the proposed developments Ash Green would lose its rural identity and historic boundaries. We need to protect these areas and instead redevelop urban areas and brownfield sites.

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

Attached documents:

Comment ID: pslp172/2732  Respondent: 15262785 / Jonathan Henderson  Agent:

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

OBJECTION TO SITES A28 & A29 AND THE PROPOSED CHANGE TO ASH GREEN BOUNDARIES

I believe the title of Policy A28 needs to be corrected to say “Ash Green” not “Ash”. Policy A28: Land to the east of White Lane, Ash GREEN, states it requires

“(2) Sensitive design at site boundaries that has regard to the transition from urban to rural
(3) No unacceptable impact on trees and ancient woodland
(4) Recognition of the historic location of Ash Green village”.

However I believe the Local Plan (Policy A28) will impact on trees and ancient woodland within the site and does not recognise the historic location of Ash Green village. I have outlined evidence to support my beliefs below.

As the current occupier of Ash Green Station, I feel well based to be able to comment on the rather strange boundaries Guildford Borough Council has created for Ash Green in the 2017 plan. GBC are proposing that the houses of Ash Green Road along with the land south of this up to and including site A28 be included in the Ash and Tongham Urban Area (ATUA), which is historically Ash Green. There will be no boundary between Ash and Ash Green. Ash Green starts on land North of Ash Green Road (part of the proposed A29 development), a fact which seems to have been ignored by placing A28 into the proposed ATUA. I believe the countryside boundary should be placed along Ash Green Road as a minimum but ideally allowing for a buffer into the field south of Ash Manor but north of Ash Green Road, with A28 left as countryside, not shoe-horned in as part of the proposed plans.

The more appropriate, natural defensible boundaries would be either along the old railway line or preferably, along Ash Green Road, which would retain Ash Green village and station in its historic location.

The Ordinance survey map as shown in GBC own Greenbelt and Countryside Study names Ash Green both to the north of the old railway line as well as the south. (see below)

[Map]

As can be seen on this historic O/S map, circa 1920 there were no buildings mapped in Ash Green to the south of Ash Green Lane East, the only properties in Ash Green were those to the north of the railway cutting. Buildings specifically named are Ash Green Station and Ash Green Farm, with the ancient woodland of College Copse running from the railway cutting to Ash Green Lane (east).

[Map]

Ash Green Ash Green (modern estate) (to the south of Ash Green Lane East) was not the original Ash Green, but had started to appear by mid 20th century, as this map shows circa 1944. The entrance to Dene Lodge through the ancient woodland marked as College Copse has been mapped, showing that the whole of site A28 was originally covered by College Copse. A portion of the remainder in A28 is now classed as ancient woodland, therefore we believe any trees north of the ancient woodland on A28, especially on the western boundary of A28 adjoining White Lane up to the railway cutting be treated with a high degree of sensitivity as they are growing on land which once formed College Copse.

[Map]
In addition to the above maps in relation to the boundaries of Ash Green village, this image from 1977 shows signage indicating Ash Green is to the north of the railway cutting as well as to the south.

I would also like to bring to attention that the bus stop north of the railway line outside the old station on White Lane is referred to as “Ash Green, Old Station”.

I wholly agree with your statement in the local plan (below) Section 3 Spatial Vision, which states:

“Further development is also proposed in and around Ash and Tongham on land beyond the Green Belt along with new green belt designated to prevent Ash and Tongham merging with the village of Ash Green.”

I wish to see historic Ash Green comprising Ash Green Road and Ash Green Station included as part of the area of separation.

I feel the locally listed building of Ash Green Station under the proposed plans would lose its historic context of actually being in Ash Green. It is a ‘Heritage asset’ as defined by the NPPF; “A building, monument, site, place, area or landscape identified as having a degree of significance merit [considerations in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)” The NPPF also states “Significance derives not only from a heritage asset’s physical presence, but also from its setting”. I believe Guildford Borough Council needs to give more consideration to Ash Green Station and its historical setting.

As stated in Policy D3 below: Historic Environment.

1) We will conserve and enhance the historic environment will be conserved and enhanced in a manner appropriate to its significance. We will support development of the highest design quality that will sustain, conserve and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported.

2) Heritage assets are an irreplaceable resource and 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.

The proposal to remove historic Ash Green from Ash Green goes against the NPPF policy contained within the Local Plan (as shown below), which GBC says it will adhere to.

4.5.43 We will ensure that new development must will conserve heritage assets in a manner appropriate to their significance. The NPPF defines significance as “The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.” The contribution of the setting of heritage assets to the appreciation of these qualities will be carefully considered alongside more direct impacts of development proposals.”

The proposed changes would remove Ash Green Station (locally listed) and Ash Green Road out of Ash Green, as well as the historic housing of the Ash Green area.

By developing A28 there is also potential to lose the aforementioned ancient woodland within A28 as well as detracting the original setting of The Old Station.

A29 also goes against this policy and NPPF guidelines by placing Grade II Listed Ash Manor and associated buildings in the centre of a modern housing estate.
Policy D4: Character and design of a new development states that
1) High quality design is expected in the borough. All developments will:
(l) conserves locally and nationally important heritage assets and conserves or enhances their settings
(m) has 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.

By moving Ash Green village boundary (l) would not be complied with. A28 would also have an impact on Dene Lodge
(locally listed building) and A29 (south of Ash Green Road) would impact on the setting of Woodberry (also locally
listed). Development of A29 around Ash Manor would impact the historic settings of Ashe Grange, Ash Manor, Old
Manor Cottage, The Oast House, Stable and The Barn to the south of Ash Manor, all Grade II listed properties.

In reference to (m), development of A28 has the potential to block sunlight, reduce privacy and increase noise at our
property, due to the unusual fact it is built into a railway cutting and as a result it is below the ground level of A28.
Station house ground floor only has windows on the southern side of the house (as the northern side is built into the
bank), therefore the horizon for our southern aspect on this floor has a much lower effective horizon and as a result the
sun only just reaches our windows in winter months. If development occurs on the northern boundary of A28 it could
well result in the complete blocking of natural light to the property on the ground floor. Station House suffers from an
unusual phenomenon in that sound reverberates and travels along the old railway cutting. We often hear the noise of
trains on the current line in our house, even though it is some distance away. We have concerns that noise from A28, A29
and A31 will carry along the cutting in the same way.

As can be clearly seen on the map below, sites A28 and A29 to the south of Ash Green Road really don’t make any sense
in terms of preserving historic Ash Green and should be removed from the plan. The buffer zone to separate Ash from
Ash Green should be placed on the land to the north of Ash Green Road up to and around Ash Manor to compliment and
preserve its well documented historic setting.

[Map]

With the proposed southern extension of A28 it will potentially require the felling of trees and the destruction of the
ancient woodland of College Copse up to the driveway of Dene Lodge. If A28 and the area of A29 south east of Ash
Green Road are removed from the Local Plan it will provide obvious continuity to the natural defensible boundary for the
countryside (the ancient woodland which bounds the eastern edge of A29 should be included in this) thereby preventing
the urban sprawl of Ash and merging of Ash Green into the ATUA.

[map]

I also object to some of the current and proposed wording in the plan.

I believe Policy P3: Countryside, 4.3.29 should be amended to “Originally consisting of the three small rural villages of
Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford
borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic
location for development. However to make this growth sustainable, suitable infrastructure must be implemented before
further development”. This is because I think infrastructure is greatly lacking, especially in relation to roads, traffic and
public transport.

I believe 4.3.30 should be amended to “We do however wish to ensure that whilst accommodating this growth, we are
able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic
character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”. I think it is
vital this sentence be included in the plan as there is a real danger with the current proposed sites of A28 and A29 losing
Ash Green’s historical location and identity.

I believe Policy P3: Countryside (1) (c ) should be amended to “does not lead to greater physical or visual coalescence
between Ash Green, the Ash and Tongham urban area and Aldershot”, in order to protect Ash Green as a separate village.
I believe Policy A29: Land to the south and east of Ash and Tongham, Requirements (6) needs to be amended to protect Ash Green village and the houses within it. As I have pointed out and evidenced with maps, Ash Green Station and the houses along Ash Green Road formed the village of Ash Green before the more modern buildings south of the railway cutting appeared, and therefore it is indefensible that GBC want to remove the buildings that originally formed Ash Green village from Ash Green.

I believe the wording needs to be “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”.

The wording in Policy A29, Requirements (8) does not offer enough protection to the Grade II listed buildings of Ash Manor and their surroundings, and therefore should be more specific and say “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.”

In Policy A29, I believe Requirements (9) of a new road and footbridge should be in place before any development of A29 commences and the wording should reflect this. Also requirement (9) does not address the other significant transport infrastructure improvements that are required to cope with the huge increase in traffic created by Policy A29.

According to the NPPF guidelines Ash Green is not a suitable location for sustainable development because it has no shops, doctors, community facilities and its public transport infrastructure is very poor. Guildford Borough Council’s own Settlement Hierarchy ranks this as the least sustainable location in the borough. Site A28 lies within Ash Green and therefore should be removed from the Local Plan.

Local schools, doctors and dentists are already under pressure. I currently struggle to get a doctors appointment within two weeks.

I believe the proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally. We have eight of the top hotspots for traffic congestion within Surrey in and around Ash. The Hogs Back at peak times is extremely congested and would struggle with any increase in volume.

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Where would the proposed entry and egress points be for site A28? White Lane would be awkward and dangerous as it has a blind crest on the bridge to the north and a slight curve in the road to the south. Drovers Way is not designed to take this level of traffic. The junction of White Lane, Ash Green Road and Foreman Road has a history of accidents and a development on A28 would potentially add to this problem with increased traffic levels. I feel it would be an incredible tragedy to lose such a wonderful greenfield site, which once developed, we would never get back, for us, or future
generations. Under the proposed developments Ash Green would lose its rural identity and historic boundaries. We need to protect these areas.

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

Attached documents:  [Henderson Objection.pdf](Henderson%20Objection.pdf) (1.6 MB)

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Comment ID: pslp172/2818  Respondent: 15384481 / M J Levers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

Objection to Policy Numbers A27, A28, A29 and to the map on page 301 (offices) because of lost countryside and amenity, extra traffic, more congestion (entry and exit from Guildford Road, which is already seriously congested daily) more parked cars at local shops, more pollution, more demand for local services.

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

Attached documents:

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Comment ID: PSLPS16/7144  Respondent: 15629377 / The Woodland Trust (Jack Taylor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A28

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

<table>
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<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
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<td>Land to the East of White Lane, Ash Green</td>
<td>Ash Green</td>
<td>C3, 52 Homes</td>
<td>Adjacent</td>
<td>College Copse ASNW, SU902499</td>
</tr>
</tbody>
</table>

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

Attached documents:

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Comment ID: PSLPS16/7816  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

An impact study would be required. There is history of hydraulic flooding and there are no surface water sewers shown in the vicinity of this proposed site.

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

Attached documents:

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Comment ID: PSLPS16/5291  Respondent: 15733665 / Vortal Properties Ltd  Agent: Shrimplin Brown (James Brown)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A28

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

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Site Allocation A28: Land to the East of White Lane, Ash

Our Client support the allocation of Site A28 for approximately 62 new homes.

The site would, however, be more appropriately described as Land East of White Lane, Ash. This would reflect the Proposals Map designation which shows the site within the defined Ash Urban Area.

The site currently included within the Site Allocation extends to 1.9 Hectares and is currently open pasture land. To the north of the site is the route of a former (now dismantled) railway line. The site has access from White Lane. The site area should be increased to include additional land to the south (2.48 hectares) which will largely form a landscape buffer but which may be required in part on the road frontage to facilitate access and visibility.
The summary table at Page 24 lists the 62 unit capacity as a ‘Total number of Homes- Approx’, however, this should not be imposed as a limit on site capacity.

Our Client agrees with the Council that the site may be suitable for residential use, however, also highlights that the site could be suitable for a C2 care village or other specialist retirement housing use.

SUPPORT ALLOCATION

Our Client supports the inclusion of land to the east of White Lane, Ash Green (Site A28) The Client, however, recommends that:

- The site description is amended to Land to the East of White Lane, Ash to reflect the inclusion of the site in the amended Ash Urban area;
- The identified site area is enlarged to include the additional land to the
- The Site Allocation recognises the potential for use as a C2 care village or other C2 accommodation for older people or other specialist retirement

James Brown ShrimplinBrown Ltd 15th July 2016

JOB REF: 16118


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

Attached documents:  Red Line Boundary Plan.pdf (127 KB)
Correct title of Policy A28 to say Ash Green, and not Ash.

• Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

Correct title of Policy A28 to say Ash Green, and not Ash.

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Attached documents:

Comment ID: pslp172/4078  Respondent: 17447425 / Jonny Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

• Correct title of Policy A28 to say Ash Green, and not Ash.

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Attached documents:

Comment ID: pslp172/4319  Respondent: 17467457 / Emily Henderson  Agent:
I am writing to object to the 2017 proposed submission of the Local Plan.

OBJECTION TO SITES A28 & A29 AND THE PROPOSED CHANGE TO ASH GREEN BOUNDARIES

I believe the title of Policy A28 needs to be corrected to say “Ash Green” not “Ash”.

Policy A28: Land to the east of White Lane, Ash GREEN, states it requires
(2) Sensitive design at site boundaries that has regard to the transition from urban to rural
(3) No unacceptable impact on trees and ancient woodland
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However I believe the Local Plan (Policy A28) will impact on trees and ancient woodland within the site and does not recognise the historic location of Ash Green village. I have outlined evidence to support my beliefs below.

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In addition to the above maps in relation to the boundaries of Ash Green village, this image from 1977 shows signage indicating Ash Green is to the north of the railway cutting as well as to the south.

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“Further development is also proposed in and around Ash and Tongham on land beyond the Green Belt along with new Green Belt designated to prevent Ash and Tongham merging with the village of Ash Green."

I wish to see historic Ash Green comprising Ash Green Road and Ash Green Station included a part of the area of separation. I feel the locally listed building of Ash Green Station under the proposed plans would lose its historic context of actually being in Ash Green. It is a ‘Heritage asset’ as defined by the NPPF; “A building, monument, site, place, area or landscape identified as having a degree of significance meriting considerations in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority
small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and wording in the plan. I believe Policy P3: Countryside, 4.3.29 should be amended to "Originally consisting of the three countryside (the ancient woodland which bounds the eastern edge of A29 should be included in this) thereby preventing Green Road are removed from the Local Plan it will provide obvious continuity to the natural defensible boundary for the ancient woodland of College Copse up to the driveway of Dene Lodge. If A28 and the area of A29 south east of Ash Road up to and around Ash Manor to compliment and preserve its well documented historic setting. A28 and the area of A29 south east of Ash Green, as well as the historic housing of the Ash Green area. By developing A28 there is also potential to lose the aforementioned ancient woodland within A28 as well as detracting the original setting of The Old Station. A29 also goes against this policy and NPPF guidelines by placing Grade II Listed Ash Manor and associated buildings in the centre of a modern housing estate. Policy D4: Character and design of a new development states that 1) High quality design is expected in the borough. All developments will: (l) conserves locally and nationally important heritage assets and conserves or enhances their settings (m) has 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. By moving Ash Green village boundary (l) would not be complied with. A28 would also have an impact on Dene Lodge (locally listed building) and A29 (south of Ash Green Road) would impact on the setting of Woodberry (also locally listed). Development of A29 around Ash Manor would impact the historic settings of Ashe Grange, Ash Manor, Old Manor Cottage, The Oast House, Stable and The Barn to the south of Ash Manor, all Grade II listed properties. In reference to (m), development of A28 has the potential to block sunlight, reduce privacy and increase noise at our property, due to the unusual fact it is built into a railway cutting and as a result it is below the ground level of A28. Station house ground floor only has windows on the southern side of the house (as the northern side is built into the bank), therefore the horizon for our southern aspect on this floor has a much lower effective horizon and as a result the sun only just reaches our windows in winter months. If development occurs on the northern boundary of A28 it could well result in the complete blocking of natural light to the property on the ground floor. Station House suffers from an unusual phenomenon in that sound reverberates and travels along the old railway cutting. We often hear the noise of trains on the current line in our house, even though it is some distance away. We have concerns that noise from A28, A29 and A31 will carry along the cutting in the same way. As can be clearly seen on the map below, sites A28 and A29 to the south of Ash Green Road really don’t make any sense in terms of preserving historic Ash Green and should be removed from the plan. The buffer zone to separate Ash from Ash Green should be placed on the land to the north of Ash Green Road up to and around Ash Manor to compliment and preserve its well documented historic setting. With the proposed southern extension of A28 it will potentially require the felling of trees and the destruction of the ancient woodland of College Copse up to the driveway of Dene Lodge. If A28 and the area of A29 south east of Ash Green Road are removed from the Local Plan it will provide obvious continuity to the natural defensible boundary for the countryside (the ancient woodland which bounds the eastern edge of A29 should be included in this) thereby preventing the urban sprawl of Ash and merging of Ash Green into the ATUA. I also object to some of the current and proposed wording in the plan. I believe Policy P3: Countryside, 4.3.29 should be amended to " Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and
now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development”. This is because I think infrastructure is greatly lacking, especially in relation to roads, traffic and public transport. I believe 4.3.30 should be amended to “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”. I think it is vital this sentence be included in the plan as there is a real danger with the current proposed sites of A28 and A29 losing Ash Green’s historical location and identity. I believe Policy P3: Countryside (1) (c) should be amended to “does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”, in order to protect Ash Green as a separate village. I believe Policy A29: Land to the south and east of Ash and Tongham, Requirements (6) needs to be amended to protect Ash Green village and the houses within it. As I have pointed out and evidenced with maps, Ash Green Station and the houses along Ash Green Road formed the village of Ash Green before the more modern buildings south of the railway cutting appeared, and therefore it is indefensible that GBC want to remove the buildings that originally formed Ash Green village from Ash Green.

I believe the wording needs to be “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”. The wording in Policy A29, Requirements (8) does not offer enough protection to the Grade II listed buildings of Ash Manor and their surroundings, and therefore should be more specific and say “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.” In Policy A29, I believe Requirements (9) of a new road and footbridge should be in place before any development of A29 commences and the wording should reflect this. Also requirement (9) does not address the other significant transport infrastructure improvements that are required to cope with the huge increase in traffic created by Policy A29. According to the NPPF guidelines Ash Green is not a suitable location for sustainable development because it has no shops, doctors, community facilities and its public transport infrastructure is very poor. Guildford Borough Council’s own Settlement Hierarchy ranks this as the least sustainable location in the borough. Site A28 lies within Ash Green and therefore should be removed from the Local Plan. Local schools, doctors and dentists are already under pressure. I currently struggle to get a doctors appointment within two weeks. I believe the proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally. We have eight of the top hotspots for traffic congestion within Surrey in and around Ash. The Hogs Back at peak times is extremely congested and would struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major routes out of Aldershot meeting the A323 at Ash), these new developments in Hampshire will put a strain on everything before Guildford Borough Council start with any of their proposed developments.

Ash Green, Ash and Tongham has a long recorded history of flooding issues. With the proposed level of development this will do nothing other than exacerbate an already major problem. Our house currently suffers the effects from poor water drainage as the railway cutting is used for local surface water drainage. I have serious concerns that major development around us could lead to further issues regarding flooding.

Where would the proposed entry and egress points be for site A28? White Lane would be awkward and dangerous as it has a blind crest on the bridge to the north and a slight curve in the road to the south. Drovers Way is not designed to take this level of traffic. The junction of White Lane, Ash Green Road and Foreman Road has a history of accidents and a development on A28 would potentially add to this problem with increased traffic levels.
I feel it would be an incredible tragedy to lose such a wonderful greenfield site, which once developed, we would never get back, for us, or future generations. Under the proposed developments Ash Green would lose its rural identity and historic boundaries. We need to protect these areas.

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

"Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development”

“We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”

“does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village.

Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.”

Attached documents: [Henderson Objection to Local Plan (2).pdf](/file.pdf) (1.6 MB)
Correct title of Policy A28 to say Ash Green, and not Ash.

Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

Correct title of Policy A28 to say Ash Green, and not Ash.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

Attached documents:
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Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

Attached documents:

Comment ID: pslp172/4970  Respondent: 17616161 / Kevin & Susan Fealey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

Correct title of Policy A28 to say Ash Green, and not Ash.

• Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

Correct title of Policy A28 to say Ash Green, and not Ash.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

Attached documents:

Comment ID: pslp172/2708  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 A28

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

Vortal Properties support the inclusion of Site A28 within the extended Ash Urban area and the update to the site reference as 'Land to the east of White Lane, Ash'.

Also supported is the increase gross area of the allocation to 2.85 hectares, taking into account the additional land west of the site up to highways land, and the Ancint Woodland to the south, to form a landscape buffer and facilitate access and visibility.
In relation to Site A28 a larger area of land is available for release to the east of the site that would be suitable for an area of Open Space and assist with meeting the identified opportunity for 'green corridors and linkages to habitats outside of the site.' The boundary would need to extend so the additional land is set within the defined Urban Ash area and removed from the greenbelt.

The additional land (totalling 0.28 hectares in size) is outlined below in blue increasing the overall size of the allocation to 3.13 hectares.

[Map]

The inclusion of wording for the allocation at Site A28 to be suitable for both homes (C3) and accommodation for older people (C2) is supported to allow flexibility for development of the site.

[Text of attachment reproduced below]

Vortal Properties support the allocation of Site A28 for approximately 62 new homes, and the following changes;

- Change in the site name to ‘Land to the east of White Lane, Ash’
- Site allocation area increased to 2.85 hectares to include land to the west and south to form a landscape buffer and facilitate access and visibility
- The acknowledgement of the allocation to cater for ‘a mix of homes (C3) and accommodation for older people (C2)’

However, we recommend that:

- The identified site area is enlarged to include the additional land to the east bring the size of the allocation to 3.13 hectares
- The land to the east is removed from the greenbelt and included within the urban area boundary for Ash and Tongham

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

Inclusion of additional land to the east of the site within allocation A28 (highlighted blue)

Attached documents: [Vortal Properties Reps - Site A28 GBC Local Plan Revisions.pdf](Vortal Properties Reps - Site A28 GBC Local Plan Revisions.pdf) (673 KB)

Comment ID: pslp172/5428  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

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

Vortal Properties are broadly supportive of the changes to the content of the plan and are specifically supportive to the changes made to Site A28 - Land east of White Lane, Ash Green Key Diagram and Proposals Map (Paragraph 1.15) In relation to Site A28 a larger area of land is available for release which should be included in the allocation (see response to PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2017 - PART 2: SITES) and set within the defined Ash Urban Area on the Proposals Map, as well as its removal from the proposed area of greenbelt.

Spatial Vision

The Plan continues to rely heavily on large strategic releases, most notably from the changes in delivery of housing, which is now heavily weighted towards the end of the plan. Emphasis, in the short term, should be focused on the delivery of smaller sites, including land at Ash and Tongham (Site A28) which will not require large infrastructure delivery, as well as assisting Guildford meet its identified shortfall in 5-year land supply.
Vortal Properties role as development partner of Site A28 wish to reserve the right to attend the Examination in order to clarify any elements relating to the site allocation and/or the site capacity, appropriate use and/or the implications of any plan policies for the delivery of the allocation.

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: A29 - Land to the south and east of Ash and Tongham
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPS16/227  Respondent: 8555489 / Alan Norris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

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

Site A29 - Land to south and east of Ash and Tongham;

I note the following comment re roads linking new estates to provide alternative distributor roads:

Proposed road layout or layouts to provide connections between both the individual development sites within this site allocation and between Ash Lodge Drive and Foreman Road, providing a through road connection between Ash Lodge Drive and Foreman Road, in order to maximise accessibility and to help alleviate congestion on the A323 corridor.

The reserved matters planning application (16/P/00980) for the 400 house development on land to south of Ash Lodge Drive is currently in the planning approval process. The plans for this development should include a link road between the estate distributor road and a made up Ash Green Lane West. This road would provide a link between the new and proposed developments accessed from Ash Green Lane West comprising a total of 60 + 26 + 55 + 14 units (total = 155 houses), in line with the proposed Local Plan policy statement.

(I have submitted this comment in respect of planning application 16/P/00980 - but the Local Plan team may wish to reiterate it as part of the planning application comments.)

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

Attached documents:

Comment ID: pslp172/3146  Respondent: 8555489 / Alan Norris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

Site allocation A29 (and the deleted A30)

Land adjacent to Ash Station needs to be reserved for car parking / pick-up and drop-off areas and local bus stops. As the road bridge and access roads (previously shown in deleted site allocation A30) have now been incorporated into site allocation, there is no distinction between the land for housing and the land for the road / bridge / station and transport purposes. By not segregating these two different land uses, there will be pressure from developers for housing right up to the station area, without leaving adequate land for the essential transport purposes. With a good rail service to Guildford, Ash station could become an effective transport interchange and provide a park and ride facility to Guildford for the 2000+ new houses approved or proposed in the Ash / Tongham area and for existing residents, thus relieving car use on the A31 and A323 roads. Once land close to Ash station is developed for housing it is no longer possible to use that land for transport services. In such a scenario there would be increased parking pressure on nearby residential roads, as there are at present due to the limited car park spaces at Ash station.

(Ash Vale station is an example where there is inadequate parking provision (all the available places are filled by 7.00am on weekdays) and because of close by housing there is no land available for additional parking.)
Guildford Borough contains some “Countryside Beyond the Green Belt”, although this notation covers only 2% of the Borough, and is located in the west of the Borough near Ash and Tongham. Mindful of the hierarchy set out in paragraph 4.3 above, and the need to identify enough land to deliver an average of 693 new dwelling a year, the draft Plan contains several housing allocations that fall on land that is subject to this designation.

Policy A29 is the most significant of these allocations, identifying land for approximately 1200 homes around Ash and Tongham. A map showing the distribution of the sites that comprise this allocation is shown at Appendix 1 of this report. In addition to this, there are two other smaller allocations (A27: Warren Farm, Ash Green and A28: Land to the east of White Lane, Ash Green) of 120 units in total, 629 homes with planning permission (net outstanding) and 124 completions since the base date of 2013. In the wider Ash and Tongham area, taking into account completions, permissions and Local Plan allocations, this equals 2,057 homes to be delivered by 2033.

In terms of any potential cross boundary impacts of this development identified in Policy A29, whilst it is located close to the boundary with Rushmoor Borough, mindful of the constraints noted above, Guildford Borough Council has very limited opportunities to accommodate its objectively assessed housing need. The draft Plan contains a number of other strategic housing allocations, including land at former Wisley Airfield (2,100 homes), Slyfield Regeneration Project (1,000 homes), Gosden Hill Farm (2,000 homes), and Blackwell Farm (1,800 homes). In addition, there are a number of other allocations of around 100 units. Importantly, the evidence supporting the Plan has had to review the function of land within the Green Belt, and facilitate some land releases from it, in order to achieve the scale of residential development required to meet Guildford’s OAN.

Rushmoor Borough Council is supportive of Guildford’s approach of “leaving no stone unturned” in seeking to meet its housing need. This is positive in as much as it is not asking Rushmoor to help meet its housing needs, and in this respect, at this point in time, both authorities can be said to satisfy the “duty to cooperate” on the cross boundary strategic issue of meeting housing needs.

The Strategic Highway Assessment report (2016) sets out that in respect of the development proposed in the Local Plan, without any mitigation, the greatest potential impacts are seen on the network in the vicinity of Ash / Ash Vale and travelling north into the borough of Surrey Heath. Some of the trips in Ash / Ash Vale will join the A331 Blackwater Valley Road to travel further afield, but it is likely that a reasonable proportion will travel into the neighbouring boroughs of Rushmoor and Surrey Heath. Some of these roads already experience congestion, despite the model suggesting that existing traffic flows are relatively low.

Specifically of interest to the strategic allocation around Ash and Tongham, further information on key infrastructure projects is provided at Appendix C of the draft Plan, in the Infrastructure Schedule. Infrastructure projects LRN9 through to LRN14 relate to improvements to traffic management and environmental improvements in and around Ash, Ash Vale and Tongham, to be funded through a combination of developer contributions and Enterprise M3 Local Economic Partnership Local Growth Fund awards. For example, the schedule identifies LRN14, which is a junction improvement scheme at the connection of the A331 Blackwater Valley Route with the A31 Hog’s Back (Tongham). It is important to note that this mitigation is required to enable the development proposed in the Local Plan to proceed.

In this context, Rushmoor Borough Council is supportive of the planning policy framework and detailed infrastructure projects as they relate to the road network, subject to certainty regarding the delivery of these improvements as part of the overall package of implementation of development in and around Ash, Ash Vale and Tongham.
However, in the absence of the implementation of the full suite of transport policies and proposals to support the quantum of development set out in the Local Plan, this would potentially result in negative cross boundary transport impacts, the residual cumulative impacts of which would be severe. In this context, the Council looks forward to continuing to work with Guildford Borough Council on potential cross boundary strategic transport issues, to ensure that those arising from development proposed in the Guildford Local Plan are appropriately mitigated.

In addition, PED6 sets out a potential expansion of Ash Grange Primary School if required to provide spaces for the primary age children who will live in the new homes to the south and east of Ash and Tongham. These infrastructure proposals are supported by Rushmoor Council, mindful of the strategic allocation for residential development in and around the settlements of Ash and Tongham.

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

Attached documents:

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Comment ID: PSLPS16/8282  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

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

As acknowledged this site allocation potentially impacts the Ash Green Meadows SNCI & several Ancient woodlands. The Trust reserves further representation if these tensions cannot be satisfactorily reconciled.

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

Attached documents:

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Comment ID: pslp172/2558  Respondent: 8595777 / Ash Green Residents Association (Paul Povey)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

Policy A29: Land to the south and east of Ash and Tongham

We object to the increase from 1200 to 1750 homes as this would increase the pressure of coalescence between the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

• Requirement 6 Amend: "Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green Village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"
• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

- The Street in Tongham
- A331/A323 intersection and A331/A31 Intersection
- A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp172/4260  Respondent: 8605889 / Surrey County Council (Sue Janota)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

Policy A29 – Land to the south and east of Ash and Tongham We welcome the amendment to this policy which currently states that an appropriate financial contribution is required to enable expansion of Ash Manor Secondary School by additional 1FE. It is felt that this should read “contributions” (plural) as it is likely more than one contribution will be sought towards the costs of the expansion.

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

Attached documents:
Object

The level of development in Ash would significantly increase traffic on the highway network through Wood Street. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity.

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

Attached documents:
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<th>Comment ID: PSLPS16/1203</th>
<th>Respondent: 8729313 / Lisa Wright</th>
<th>Agent:</th>
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**OBJECT.** Traffic nightmare for anyone in the West of the Borough. Impact on A31/A3. Aldershot Road.

No cooperation with Rushmoor Council

**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: pslp172/1377</th>
<th>Respondent: 8794881 / Leslie Garthwaite</th>
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I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area. Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

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• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham  
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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Attached documents:

Comment ID: pslp172/5210  Respondent: 8856769 / Marion Howells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

[text of attachment reproduced below]

The suggested increase from 1200 to 1750 homes would turn the area locally into a large Urban Area and join Ash, Tongham and Ash Green. Please let us protect the historic location of Ash Green.

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

Attached documents:

Comment ID: PSLPS16/4895  Respondent: 8890753 / Jan Messinger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the Policy A29 Land at Ash and Tongham the high levels of housing being put in this area will have an affect upon the A323 going through Worplesdon and other local roads. This road is already at too high a level of traffic congestion. As are too many roads in this borough.

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

Attached documents:

Comment ID: pslp172/3704  Respondent: 8902913 / Jessica Povey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which
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Attached documents:

Comment ID: pslp172/2612  Respondent: 8908193 / David Wyatt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the increase from 1200 to 1750 homes as this would increase the pressure of coalescence between the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

- Requirement 6 Amend: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

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**Attached documents:**
3) The other change to the Plan which we would like to comment upon is in respect of site A29, which relates to land to the south and east of Ash and Tongham. The site was formerly allocated for approximately 1200 new homes, which has been increased to approximately 1750 new homes in the new version, an increase of almost 50%. An increase of this magnitude will inevitably have a huge impact upon the villages of Normandy and Flexford, in particular upon the volume of traffic on the A323 and the A324, and other roads in the area. The A323 and the A324 are already heavily congested at peak periods and we do not feel that sufficient consideration has been given to problems arising from the increased volume of traffic generated by the number of houses proposed for site A29. In addition this increase in the volume of traffic will have an impact upon the Thames Basin Heaths Special Protection Area which lies to the north of the A324, and upon Normandy Common SNCI which lies between the A324 and the A323. In this respect we feel that the change to site A29 is unsustainable. In this respect we consider that Policy A29, is unsound.

4) Another change which relates to Policy A29, is the deletion of Policy A30 in the current version of the plan. Policy A30 allocated land for a new road bridge and associated footbridge to be built near Ash Station to replace the existing level crossing, and to form part of the A323. That this site has been taken out presumably relates to the fact that the boundaries of Policy A29 near the level crossing have been changed to exclude the fields and four permanent traveller pitches which were contained within Policy A30. We assume that this means that currently GBC are unable to allocate land at the level crossing for the proposed bridges. Policy A29 is described as a strategic location for development, and one of the requirements for it to proceed, Policy A29(9), is “Land and provision of a new road bridge…to enable closure of the level crossing…adjacent to Ash railway station”. We believe that consideration should be given to the question as to whether the deletion of Policy A30 makes Policy A29 unsound, because without an allocation of land the requirement for a new road bridge and footbridge cannot be fulfilled. Presumably if land on which such bridges can be built cannot be acquired, Policy A29 will fail in its entirety. However it is unclear whether the requirement for the construction must be fulfilled before any development in accordance with Policy A29 can commence, or just that the bridges must be built at some point within the dates given in the Infrastructure Schedule of Appendix C, LRN21 (ie. Between 2018 and 2024.) In such a case what would be the result if no land became available during the specified period? If, as seems the case, the position is uncertain, how can Policy A29 be implemented, and how can it meet the tests of “soundness”.

For the reasons set out in points 3) and 4) above, we consider that Policy A29 is unsound, and we object to the changes made in respect of this Policy.

5) We believe that it is necessary to provide a SANG to mitigate against impacts on the Thames Basin Special Protection Area (SPA ) from the developments proposed by Policies A27, A28 and A29), but there is no bespoke SANG relating to these. If the SANG proposed at land to the west of Ash Green is intended to cover this requirement, there does not appear to be any indication in the plan that the size of such SANG has been increased to match the increase in the number of houses proposed in Policy A29.

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

Attached documents:
Policy A29: Land to the south and east of Ash and Tongham should be amended to: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house.

Requirement 8 should be amended to: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Infrastructure must come before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore, solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A323 from A331 to Ash Station
4. A31/White Lane junction

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<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4183</th>
<th>Respondent: 8933185 / Peter See Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29</td>
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</tbody>
</table>
Objection - The reasons for objection are below (on pages 19-21 of this letter)

Strategic Location for Development

The words 'This is a strategic location for development' should be removed. There is an implication that you would like inappropriate, large scale growth, perhaps with ugly tall buildings and inappropriate large scale road building.

There will be too many homes (approx. 1200). Density will be too high.

Contents of Policy A29

Your Policy, in a sense, lists reasons why too many homes are planned and why the density will be too high:

- Loss of greenfield land
- Surface water
- Grade II listed buildings
- Historic location of Ash green village
- Area of High Archaeological Potential
- Tree Preservation Orders
- Ancient woodland at some boundaries
- Desirability of a green buffer along Ash green Road
- Congestion on the A323 Ash Street, Ash Church Road Guildford Road
- Need to connect spaces and habitat within the site and to outside the site.

Pollution

For some people there may be noise issues (from the A31 Hogs Back, the A331 Blackwater Valley Road and the railway). Poor air quality must also be considered. The URS report dated August 2014, prepared for Guildford Borough Council, states 'Development at Send and Ashtrongham is likely to lead to negative effects on air quality, noise, human health and other topics'.

Should you not add 'potential noise and air quality issues' to your list in Policy A29? You mention such problems in your description of the former Wisley airfield on page 205, so there is a need to be consistent.

Highway Network

The highway network is not entirely suitable for additional development.

In my view egress from the main sites onto Ash Green Road or Harpers Road is undesirable, bearing in mind the character of these roads and the risk of injury accidents. The junctions of Harpers Road/A323 Guildford Road and Wyke Lane/A323 Guildford Road have accident records. Also, at the Harpers Road/Pound Lane junction there are historic buildings close to the road. Substantial improvement to these roads would be difficult and costly, taking into account a narrow railway bridge etc. The character of the roads which lead to and from the A323, could change so that they are no longer quiet, pleasant, rural lanes. Along the A323, the provision of more traffic signals (compared with roundabouts) would change the character of the A323 from rural to urban. Road widening, which might involve taking land from the recreation ground, would not be welcome.

Historic Environment

Regarding land North of Ash Green Road and East of Foreman Road, this site is too close to the 13th century Manor House which has a moat, or on or near to land which was once the village green. It is important that there should be no
building development anywhere near to the Manor House as it will be out of context and harm the integrity of a historic site. See Policy D3 on Page 103. South Side of Tongham

Development of land on the north side of the A31 dual carriageway, to the west of the Street, will remove the green buffer between the A31 and the village of Tongham.

Building development will spoil the rural character of the approach to Tongham (the land at present has a hop field which serves the Hogs Back Brewery which is on the east side of The Street). The only way to mitigate the effects of the proposed development would appear to be to have fewer homes and less density.

Ash Railway Station

Policy A29 mentions 'improve the level crossing'. Elsewhere in the Local Plan you have mentioned closure of the level crossing, so there is some inconsistency. Please see Policy A30, below.

After 'new road bridge' add:

'A new off-street car park will also be provided on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads'. Please see Policy A30, below.

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

Attached documents:

<table>
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Page 212, Policy A29: Land to the South and East of Ash and Tongham

Objection – The reasons for objection are below:

Strategic Location for Development

The words 'This is a strategic location for development' should be removed. There is an implication that you would like inappropriate, large scale growth, perhaps with ugly tall buildings and inappropriate large scale road building.

Numbers of Homes and Density

There will be too many homes (approx. 1750, raised from the previous figure of 1200). Density will be too high.

New Homes in Aldershot, Hampshire, 2 miles (3km) from Ash & Tongham

Paragraph 1.9 of the Local Plan mentions the duty of local councils to cooperate with neighbouring authorities. You will therefore have been aware that for the last 16 years or so Rushmoor Borough Council has had plans for 3000-4000 homes to be built upon military land (brownfield sites). Building work has now started. This is one of a number of reasons why there should be less building development proposed in the Ash/Tongham area.

Contents of Policy A29
Your Policy, in a sense, lists reasons why too many homes are planned and why the density will be too high:

- Loss of greenfield land
- Surface water flooding
- Listed buildings
- Historic location of Ash green village
- Area of High Archaeological Potential
- Potential noise and air quality issues
- Proximity to ancient woodland/SNCI

Also, there is often congestion on the A323 Ash Street, Ash Church Road, Guildford Road.

Pollution

For some people there may be noise issues (from the A31 Hogs Back, the A331 Blackwater Valley Road and the railway). Poor air quality must also be considered. The URS report dated August 1014, prepared for Guildford Borough Council, states ‘Development at Send and Ash/Tongham is likely to lead to negative effects on air quality, noise, human health and other topics’.

Highway Network

The highway network is not suitable for the scale of the proposed additional development.

In my view egress from the main sites onto Ash Green Road or Harpers Road is undesirable, bearing in mind the character of these roads and the risk of injury accidents. The junctions of Harpers Road/A323 Guildford Road and Wyke Lane/A323 Guildford Road have accident records. Also, at the Harpers Road/Pound Lane junction there are historic buildings close to the road. Substantial improvement to these roads would be difficult and costly, taking into account a narrow railway bridge etc. The character of the roads which lead to and from the A323, could change so that they are no longer quiet, pleasant, rural lanes. Along the A323, the provision of more traffic signals (compared with roundabouts) would change the character of the A323 from rural to urban. Road widening, which might involve taking land from the recreation ground, would not be welcome.

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Regarding land North of Ash Green Road and East of Foreman Road, this site is too close to the 13th century Manor House which has a moat, on or near to land which was once the village green. It is important that there should be no building development anywhere near to the Manor House as it will be out of context and harm the integrity of a historic site. See Policy D3 on Page 116.

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After '(9) new road bridge' add:

'A new off-street car park will also be provided on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads'.

Land for New Road Bridge and Footbridge Scheme to enable Level Crossing Closure on A323 Guildford Road Adjacent to Ash Railway Station, Ash

Land for Off-street Parking in the Vicinity

The existing, small, Ash railway station car park is inadequate. There is a need for a firm plan to provide a new off-street parking for cars and cycles on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads. The parking area could be provided before a bridge is built. It could then be adapted to fit land available after a bridge is built. The new car park could be landscaped and secure. It could be funded by contributions from developers and/or Guildford Borough Council in view of the need to address travel problems which will arise from the Council's policies of adding new homes in the area (1750 in Ash and Tongham). The Local Plan will mean that there will be over 2000 more cars and other vehicles owned within a few miles of Ash railway station.

Land for Cycle Routes in the Vicinity

High standard cycle routes could be provided, on and off the highway, to encourage cycling to the station and to help the safety of cyclists.

If necessary, traffic signals could help pedestrians and cyclists to cross the A323.

Note: If these proposed additional requirements for off-street parking and cycle routes are not included in the Local Plan, there is a risk that they will be overlooked.

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

After '(9) new road bridge' add:

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Attached documents:

Comment ID: pslp172/5313  Respondent: 8961409 / Norman Bristow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

  a) The Street in Tongham
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongharn and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

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Attached documents:
Comment ID: pslp172/4327  Respondent: 8964929 / C.J. Bannister  Agent:

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

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

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

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

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"
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Attached documents:

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Comment ID: pslp172/4318  Respondent: 9327329 / A2 Dominion Group  Agent: Judith Ashton Associates (Judith Ashton)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

6.1 Policy A29 now looks to provide for some 1,750 dwellings rather than the 1,200 proposed in the June 2016 PSLP. This increase is explained at p7 of the 2017 LAA update as being due to the fact that it now encompasses 'planning permissions in the area that have not yet commenced due to the current unavailability of Suitable Alternative Natural Greenspace (SANG).” Whilst we would take issue with this as the consented site at South Ash Drive (which has consent for 400 dwellings (16/P/00980 refers)), also provides for some 24ha of SANG to accommodate its needs and that of the wider area, we note that policy A29 as amended also now requires:

1) Appropriate financial contributions to enable expansion of Ash Manor Secondary School by additional 1FE
2) Appropriate financial contributions towards expansion of existing GP provision in the area or land and a new building for a new GPs surgery
3) Sufficient capacity is available within Ash Vale wastewater treatment works to accept wastewater from this development within its permitted limits
9) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station

6.2 Whilst not wishing to comment on criterion 1 and 3, the simple fact is the land at South Ash Drive has already made provision for a doctor’s surgery (criterion 2) such that the need for others to do so is open to debate. Furthermore there is no claw back mechanism within the S106 for the land at South Ash Drive for the developer to receive contributions from others to help off-set the costs of providing the doctors surgery such that this cost has been born solely by those developing the land at South Ash Drive (A2 and Bewley). It is thus questionable as to whether the inclusion of criterion 2 in policy A29 as amended is justified, and accords with national government guidance in terms of the CiL regulations.

6.3 In addition to the above the requirement for the land allocation pursuant to policy A29 to provide for a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station is in our opinion unjustified.

6.4 We understand that SCC is concerned about the future operation of the level crossing due to a) development impacts; and also b) the potential closure of the right turn lane into White Lane from the A31 for highway safety reasons, which may result in traffic re-routing via the level crossing.

6.5 In the context of the above we are not aware that SCC have:-
• Modelled the net impact of development (i.e. considering what already has permission) nor have they tested the re-routing effects of closing the A31 right turn lane (noting that ‘other routes are available’);
• Modelled the impact of the potential increase in trains using the line;
• Looked into alternative options i.e. considered the merits of improving alternative routes to those that use the Ash level crossing;
• Considered the viability of delivering the bridge relative to the number of sites that have permission and those that remain subject to applications/ have yet to be bought forward in the allocated area; and
• Sought to establish those parts of the allocation that will have an impact on the crossing and those that will not. The above two points will leave relatively few dwellings footing an exceptional bill.

6.6 Given the above we consider there to be no evidence to demonstrate that
A. The bridge is necessary;
B. How much it will cost and how it can be provided; and
C. The programme for its delivery and how this relates to the Council's housing trajectory for the delivery of housing from the Ash/Tongham allocation.
Furthermore we note that the area allocated pursuant to policy A29 does not include the land necessary to provide for a new road and footbridge over Ash railway line, such that the councils ability to ensure delivery of this facility has not been demonstrated.[12]

6.7 On the basis of the above we do not believe the introduction of criterion 9 in policy A29 as amended to be justified, or to accord with national government guidance in terms of the CiL regulations.
6.8 In addition to the above we would point out that planning permission exists within the area designated pursuant to policy A29 for the following, which in total will provide for 725 dwellings:-
• 400 homes at Ash Lodge Drive, Ash - Application 12/P/01973;
• 56 homes on land south and east of Dene Close, Ash -Application 14/P/01870;
• 35 homes on land north of Poyle Road, Tongham - Application 12/P/01534 – RM for 26 – 16/P/00663;
• 55 homes at Minley Nursery, Spoil Lane, Tongham - Application 15/P/00293;
• 50 homes adjacent to Grange Farm, Grange Road, Tongham - Application 14/P/02398;
• 26 home on land south of Foreman Park and west of Foreman Road, Ash - Application 12/P/01534; and
• 26 homes on land at Ash Green Lane West - Application 15/P/00167.
• 21 homes on land at 109 South Lane - Application 14/P/01637
• 58 homes on land at Warren Farm, White Lane - Application 16/P/00120

[12] Policy A30 of the 2016 PSLP sought to safeguard land for a new road bridge and footbridge scheme to enable a level crossing closure on the A323 Guildford Road adjacent to Ash railway station. This policy is deleted in the 2017 PSLP. The rational for the deletion of policy A30 and the proposed additions to policy A29 in the PSLP is not clear, such that the deletion of policy A30 will in our opinion effectively prejudice the plans ability to deliver the proposed crossing and is, if the bridge is justified, unsound.

6.9 In addition there are currently outstanding (live) applications with GBC for:-
• 254 homes at Grange Farm - Application 16/P/00222;
• 50 homes at land north of Grange Road - Application 17/P/00529;
• 95 homes at Ash Manor - Application 17/P/00513; and
• 154 homes (an additional 98 homes to those already consented via 14/P/01870) at Land south and east of Dene Close Ash - Application 16/P/01679.
• 150 homes on land on Poyle Road - Application 17/P/01315

6.10 These, if consented will provide for an additional 647 dwellings, such that of the 1,750 allocated pursuant to policy A29, 1372 will have consent/ are awaiting determination, leaving just 308 to pay for the proposed 'land and new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station’ which is hardly reasonable – i.e. fairly and reasonably related in scale and kind to the development and would not comply with national government guidance.

**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? ( )

Policy A29 has been revised following the withdrawal of Policy A30 which proposed a “sound” alignment for a road over bridge for the A323 at Ash railway crossing. Paragraph 9 of amended Policy A29 now effectively replaces deleted Policy A30 with what is a demonstrably poorer solution for traffic along the A323 corridor. The original alignment for the over bridge proposed under Policy A30 is now made impossible by the exclusion of land immediately north east of the railway crossing from the Plan.

During the public drop-in event at Tongham on 15 June, I understood the GBC transport planning team representative to say that potential developers were "not interested" in supporting Policy A30 and, as GBC “had no money” for funding the railway over bridge, it was down to potential developers to propose a new bridge alignment that they would be prepared to fund. Any such alignment would seem to have to involve a significant diversion of the A323 in a "U-bend" via a series of roundabouts through the new housing estate and then almost backwards along Foreman Road to connect into the current alignment just south of the railway crossing.

This is a retrograde change to the Plan as it would lead to a deterioration in the quality of the A323 corridor for through traffic between Aldershot and Guildford compared to the previous proposal under Policies A29/A30. This section of the revised document is therefore considered “unsound”.

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

Reinstate Policy A30 to make the document "sound".

Attached documents:

Comment ID: pslp172/5021  Respondent: 10805697 / Jill Kempster  Agent:

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

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”
• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
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• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows: "Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp172/5335  Respondent: 10805761 / Russ McPhillips  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

Policy A29 Ament to: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 6 & 8 Amend to: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

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

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Requirement 6 & 8 Amend to: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp172/3009  Respondent: 10805953 / Elaine Boyes  Agent:

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

My next objection is to Policy A29: Land to the south and east of Ash and Tongham.

On this policy I want to object to the increase in the proposed number of homes of 1200 to 1750. Doing this will certainly join Ash Green Village to ATUA. This completely goes against Policy P3.

It also goes against the NPPF which identifies that there should be a limit to development in the countryside and that the rural communities should be supported. I therefore ask for the requirement 6 of this policy, which looks at protecting the ‘historic location of Ash Green’ is not good enough and needs to be reworded to give Ash Green more protection.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

To add to the amendments of policy A29, requirement 8 does not give sufficient protection to Ash Manor which is a historical farmstead constituting of 3 grade 2 listed buildings, of which the main house Ash Manor is a Medieval moated house dating back over 1000 years and is connected to Henry VIII.

It is also clearly stated in the NPPF of the need to conserve and enhance the historic environment and to recognise heritage assets as irreplaceable and protect them against any threats such as development.

To give this historical farmstead and heritage asset more protection there should be amendments to requirement 8 as follows.

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

It must be made a priority that there is adequate infrastructure in place before any development is allowed to proceed. This applies to Requirement 9, the proposed road bridge at Ash Staton and closure of level crossing.
This requirement also fails to address other infrastructure improvements in relation to transport that are needed to cope with increase of traffic that would be generated from any developments of A29. Solutions must be drawn up to address The Street in Tongham, A331/A323 intersection and A31/White Lane junction before any development of A29 can go ahead.

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

Suggested amendment to:

Requirement 6:
“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8:
“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp172/4064  Respondent: 10806081 / R Kavanagh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. Policy A29: Land to the south and east of Ash and Tongham

• I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

1. Policy A29: Land to the south and east of Ash and Tongham (Cont.)

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”.

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- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy A29 commences.
- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”.

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**Attached documents:**

Comment ID: pslp172/2972  Respondent: 10818017 / Nigel Draper  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”
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• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

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"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: pslp172/4794  Respondent: 10831745 / Diane Wilsden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

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Attached documents:

Comment ID: pslp172/4787  Respondent: 10831841 / S Wilsden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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Attached documents:

Comment ID: pslp172/5022  Respondent: 10932385 / Lynne Bryant  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

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• My concern lies with the parcel of land bordered by the A331/A31 and The Street in Tongham. Part of this land is currently being used for the growing of hops by the Hogs Back Brewery, celebrating the historic cultivation of Hops in the Farnham area. As such I would be disappointed to see this area used for housing and undermining land adjacent to the brewery which is being used as an agriculture/green space for the supply of local ingredients for the brewery.

• Given the proposed removal of A30/LRN21 (Ash Level Crossing) – which is already a traffic pinch point – and the additional traffic that could be expected to use Foreman Road to access the development, should consideration be given to facilitating a better junction between the A31 and White Lane? I am aware of a number of serious accidents that have taken place at this junction (due to cars either crossing or attempting to join the Northbound carriageway) and so I feel that with the proposed increase of houses in the areas – and hence vehicles that may be attempting to exit/join the A31 at this point, there will be further incidents if the junction is not improved.

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

Attached documents:

Comment ID: pslp172/3205  Respondent: 10984321 / Paul Povey  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: pslp172/4075  Respondent: 11031809 / Jackie Scott  Agent:

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

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

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Attached documents:

Comment ID: pslp172/4101  Respondent: 11097953 / Stephen Bowers   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29 

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

1. Policy A29: Land to the south and east of Ash and Tongham

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village, since taking into account the development that has already taken place, since the the start of the consultation the net gain in housing in the ATUA will be in excess of 2000 units. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is insufficient and requires a more robust rewording to prevent this increased potential for coalescence.

1. Policy A29: Land to the south and east of Ash and Tongham (Cont.)

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”
• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries and the avoidance of hard boundaries, in sympathy with the adjacent complex of listed buildings at Ash Manor need to be carefully and robustly implemented. Views to and from this heritage asset, including the approach from White Lane, must be protected.”

Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

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

Attached documents:

Comment ID: pslp172/2729  Respondent: 11155713 / Andrew Bandosz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

RE: REGULATION 19 CONSULTATION, DRAFT LOCAL PLAN POLICY A29

I write on behalf of Copperwood Developments Ltd, to make specific comments relating to draft Policy A29.

As background information, Copperwood Developments Ltd recently obtained Outline planning consent at appeal for 56 dwellings on Land South of Guildford Road, Ash (Application Ref 14/P/01870).

Following the appeal decision (APP/Y3615/W/15/3135326), dated April 2016, Copperwood submitted a further Outline planning application for 154 dwellings on an enlarged application site (Application Ref 16/P/01679). This application was recommended for approval to the Planning Committee (17th May 2017), who resolved to approve the scheme subject to a S.106 agreement, which included a requirement for land to be made available for the Ash road bridge as well as a contribution towards the road bridge itself.

[Location Plan for outline application 16/P/01679(154 dwellings)]

It should be noted, that as part of the planning application the applicant’s Highway Consultant’s submitted extensive reports and data to Surrey County Highways Authority (SCHA) to demonstrate that the proposal for 154 dwellings, on its own, and in combination with other development schemes in the area, would not generate a requirement for a road bridge.

The submitted transport assessment has been accepted by SCHA, who have confirmed that a road bridge is not required as part of my client’s proposal. However, Guildford Borough Council (GBC) continue to insist that a road bridge is required and refers to the emerging Policy A29. The Committee Report, whilst referring to Policy A29 and the S106 road bridge contribution, nevertheless states that the policy carries limited weight at this stage due to its draft status.
My client contends that the requirement for a financial contribution for the road bridge and for my client to gift land to the GBC for the road bridge, fails to meet the tests for S.106 agreements, namely that the requirement is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

Turning to Policy A29, I would make the following comments:

Policy A29 (1)

We note the requirement for a financial contribution towards expansion of Ash Manor Secondary School for an additional one form entry. It is not clear how these contributions will be sought, and from which developments, particularly as CIL Regulations only enable the Council to seek a maximum of 5 x S106 agreements for a specific infrastructure project.

The policy does not elaborate as to which of the planned development schemes, numbering 1,750 dwellings in total, will contribute towards the secondary school, particularly as some 40% of the 1,750 dwellings have already obtained planning consent without any contributions being payable towards the school.

It is contended, that funding for the secondary school would be more appropriate and equitable through CIL contributions, once the charging schedule is in place.

Policy A29 (2)

It is contended, that seeking financial contributions towards the expansion of existing GP provision in the area, through land and new buildings for a new GPs surgery, is a questionable infrastructure project, particularly as doctors surgeries tend to be privately owned enterprises, owned often by the practice doctors and not owned by NHS England. The contributions towards a doctors surgery could, therefore, be potentially funding a private enterprise.

As noted in the Member and officer discussion during the consideration of application 16/P/01679 (May 2017 Planning Committee), the Council officer responding to a question by a Councillor concerning contributions towards a GP surgery stated:-

“…we are trying to engage with GPs and CCGs but at the moment we don’t have a costed and worked up project by which to take a contribution to.” “…the Bewley Homes Scheme for 400 secures land for provision of a healthcare facility. If we knew what that was and we knew NHS England were going to fund it and pay for it we could seek contributions towards it. Where we are at the moment is we don’t know who will fund that or provide that. That could be provided privately for a commercial rent and if you take a contribution to it you are funding a private company to deliver something that they are providing. We don’t have enough information on what that project is at this time to be able to justify a contribution towards it. “…The answer to that question I think is we don’t have the evidence and there’s not the evidence before you in this committee to link this development to causing an unacceptable impact on local healthcare provision. I appreciate there’s lots of developments that have gone before and anecdotal evidence of GPs’ waiting times is before everybody but to be able to justify reason for refusal you would have to be able to link this development to that breaking point in healthcare provision in the area and we don’t have that evidence. Thank you Chairman”

In the light of the above officer comments to the Planning Committee Members in May of this year, it is somewhat surprising that this Policy (A29 (2)) continues to seek such contributions.

Policy A29 (9)

The policy seeks provision of a new road bridge and associated footbridge to enable the closure of the level crossing. There is no indication within the policy as to how this road bridge will be paid for. The previously superseded draft Policy A30 required developers to cover the cost of the road bridge, estimated to cost £15m to build, excluding the value of the land.

Although in the light of CIL regulations and the limit of 5 x S106 contributions towards a single infrastructure project, there is a strong possibility of a significantly high financial burden being levied against a small amount of development schemes that may come forward in the Ash and Tongham area.

Nevertheless, it is contended that the road bridge is not required to alleviate any highway safety and congestion issues. The application for 154 dwellings (16/P/01679), has shown through the transport assessment and data on queuing in the
vicinity of the level crossing during barrier downtimes, that the current proposal on its own, or in combination with other approved development schemes, will not cause a highway safety issue. The proposed road mitigation measures proposed as part of application 16/P/01679, will improve traffic movements on the immediate highway. SCHA have accepted the applicant’s findings and have not raised any objections to the proposal or indeed sought the provision of a road bridge as part of the 154 dwelling scheme.

The policy also requires developers to provide land for the road bridge, with no mention of Compulsory Purchasing the land required for the road bridge or how the land will be acquired.

We therefore contend, that the road bridge requirement of Policy A29 would fail to comply with CIL regulations should GBC seek to fund the scheme through S106 contributions.

“Planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms. Planning obligations must be fully justified and evidenced.”

(Paragraph: 004 Reference ID: 23b-004-20150326 Revision date: 26 03 2015)

It is contended, that the road bridge is not justified or evidenced as being necessary to alleviate pressures on the local highway from proposed new development.

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

**Attached documents:**

- Regulatuion 19 Consultation Draft Local Plan Policy A29.pdf (378 KB)
In particular the areas of land identified on the plan attached at Annex 1 to these representations form an integral part of the strategic development location that can and will make a valuable contribution to the delivery of new housing in this area.

Bewley Homes has a controlling interest in the area identified on the attached plan and is therefore able to ensure its complete delivery on a comprehensive basis as part of the overall strategic development location.

Given the importance of ensuring the strategic development location is cohesive and that the individual development proposals provide connections between the sites and existing urban area (a point that Bewley Homes is particularly supportive of) it is considered vital that the whole of the area covered by the strategic development location is included in the formal allocation.

The inclusion of the areas identified will also provide greater flexibility in terms of the delivery of further housing and affordable housing in a highly sustainable location outside of the Green Belt that will strengthen the Council’s housing delivery strategy.

Bewley Homes is aware of the presence of certain Heritage Assets in the vicinity of the areas identified on the attached plan. It is considered that the presence of these Heritage Assets adds greater weight to the argument that the areas identified on the attached plan should be included within the strategic development location. Their inclusion will ensure that through a comprehensive masterplanning exercise for the area under Bewley Homes’ control the Heritage Assets can be properly protected as part of any future development.

Finally it is important to note that the approach being taken by the Council will bring the areas identified into the defined urban area of Ash and Tongham in any event, wherein the principle of development will become acceptable. It is therefore logical that these areas are included within the strategic development location to ensure proper positive planning of the area rather than leaving their future development potential solely to the Development Management process.

The draft proposals map should therefore be amended to include the areas of land identified on the attached plan within the strategic development location.

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

Attached documents:  

- Proposed Submission LP Representations Proforma.Bewley Homes Plc July 2016.pdf (426 KB)
- DN.Guildford LP.Reg 19.Representations on behalf of Bewley Homes Plc Part 1 FINAL.pdf (236 KB)
- DN.Guildford LP.Reg 19.Representations on behalf of Bewley Homes Plc Ash FINAL.pdf (342 KB)

Comment ID: pslp172/5172  Respondent: 11458241 / Bewley Homes  Agent: Neame Sutton Limited (David Neame)

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

Policy A29 – OBJECT: UNSOUND – Not Positively Prepared, Justified, Effective or Consistent with National Policy:

2.67 Whilst Bewley Homes supports the allocation of land at Ash and Tongham for housing, as per the previous representations submitted in relation to the earlier Regulation 19 consultation, the revisions made to the policy in the current iteration of the Plan raise a number of fundamental issues, which are explored below.

Housing Numbers Included in Allocation:
2.68 When compared with the previous iteration of the draft policy the total number of dwellings proposed appears, on face value at least, to have increased. This is however not the case when the detail of the approach now being taken by the Council is explored.
2.69 The amendments to the draft allocation reintroduce areas that already benefit from planning consent that were previously excluded from the allocation and therefore the total number of dwellings proposed. When the areas of consented sites are discounted from the total allocation proposed the residual from the allocation is approximately 1,025 dwellings, which compares with the previous allocation figure of 1,200 dwellings. Consequently the Council’s proposed housing provision from this allocation has actually reduced by nearly 200 dwellings.

Current Consented Sites – Ash and Tongham Allocation

| Land South of Ash Lodge Drive | 400 dwellings |
| Foreman Park                  | 26 dwellings  |
| Kingston House                | 35 dwellings  |
| Minley Nursery                | 55 dwellings  |
| Ash Green Lane West           | 26 dwellings  |
| Land adjacent to Grange Road  | 50 dwellings  |
| Land south of Guildford Road  | 54 dwellings  |
| Land at 109 South Lane        | 21 dwellings  |
| Warren Farm, White Lane       | 58 dwellings  |
| **TOTAL**                     | **725 dwellings** |

2.70 This does not represent a positively planned approach particularly given the acute need for new housing in Guildford Borough and the fact that the Ash and Tongham allocation comprises the only major area outside of the Green Belt that is sustainably able to deliver further housing.

2.71 In short the Council is not seeking to make the most of this precious land resource, which fails to accord with government guidance and is consequence not justified.

Requirement for New Road Bridge (Criterion (9)):

2.72 The introduction of this Criterion into the policies corresponds with the proposed deletion of draft Policy A30. Bewley Homes raises serious concerns with the introduction of this Criterion for the following reasons:

2.72.1 **Not Justified/Necessary** – The Council has not presented any evidence either as part of the policy or in any supporting documentation to justify why a bridge over the railway in Ash is required either as part of the housing allocation or in isolation.

2.72.2 The Council has not undertaken any work to determine whether the impact arising from the allocation of additional housing in Ash and Tongham would give rise to a ‘severe’ cumulative impact as required by Paragraph 32 of the Framework such that mitigation to the railway crossing would be required. Following on from this would need to be an assessment of options in the event that mitigation was required. This has not been done.

2.72.3 **Not Reasonable/Feasible** – In the event that a bridge is required, which the Council simply does not have the evidence to determine, there is no assessment by the Council or the Highway Authority to confirm that it would be feasible either in engineering or practical terms.

2.72.4 **Not Viable** - The policy requires the delivery of both land and the bridge to be provided via the residential development of the Ash and Tongham allocation. No financial viability has been undertaken to determine how much the bridge would cost to deliver and
consequently how much the residential development would be expected to pay to determine whether the costs are reasonable related in scale and kind to the residential development proposed.

2.72.5 As a confirmation of Bewley Homes’ concerns in relation to this point the fact that 725 dwellings have already been granted consent in the allocation area leaving only 1,025 dwellings remaining of which a further 647 dwellings are the subject of live planning applications means that the pool of available dwellings against which the costs of delivering a bridge can be levied via a Planning Obligation is relatively small. No highway concerns relating to the railway crossing have been raised by the Highway Authority in relation to the 725 dwellings already consented and it would therefore appear highly unlikely that the Council would be able to justify the delivery of such a significant piece of infrastructure from the remaining 1,025 dwellings (net of 308 dwellings when existing live planning applications are removed).

2.73 For these reasons the proposal for a bridge as part of this allocation completely fails all of the Statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010.

2.74 It is also understood that the Council intends to collect financial contributions for the delivery of the bridge via Planning Obligations rather than Community Infrastructure Levy. Given the number of individual ownerships/promoters all active within the Ash and Tongham allocation area the approach the Council proposes will fail to meet the requirement of Regulation 123 of the Community Infrastructure Levy Regulations 2010 and consequently would be unlawful.

2.75 Furthermore the fact that the Council has deleted draft Policy A30 and not replaced this area within Policy A29 raises significant doubt on whether there is actually sufficient land within the scope of the allocation to deliver a bridge even if all of the above matters can be satisfactorily demonstrated by the Council. There is no justification given for the deletion of draft Policy A30 and given that Criterion (9) does not replicate the deleted policy this increases the doubt on the Council’s case for its inclusion.

2.76 The introduction of this Criterion within the draft Policy at this late stage in the process and its lack of detail in terms of the actual bridge proposal raises a serious issue in that the Council cannot possibly contend the proposal has been the subject of SA. The simple fact is the Council has not undertaken any work to determine whether the proposal is necessary and how it can be delivered against which a credible SA could be provided.

2.77 In this regard this element of the draft policy fails not only the tests of soundness in terms of not being justified, positively prepared, effective or in compliance with National policy but also fails the legal test in terms of not having been the subject of SA.

2.78 The policy therefore needs to be reworded as follows:
1. To remove Criterion (9) because there is no justification for a bridge to be provided;
2. To increase the overall housing allocation in the area to make best use of this highly sustainable location outside of the Green Belt.

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

Attached documents:
The area is long recognised as the most sustainable location in the Borough after Guildford;
- It is unconstrained by environmental designations;
- It lies in the area designated as ‘Land Beyond the Green Belt’;
- It has access to the strategic road network, specifically the A31 Hogs Back and A331 Blackwater Valley Route;
- Opportunities exist through sensitive design at the site boundaries to have regard to the transition from urban to rural; provide integrated green infrastructure enabling connectivity of spaces and habitats between land parcels; and provide sufficient SANG land for the needs of development cross boundary.

Notwithstanding this, the provision of SANG in conjunction with development proposals coming forward within this strategic location should also be incorporated within the policy, specifically SANG proposals on land at Tongham Road, Runfold which will provide mitigation for residential development on land to the west of The Street, Tongham as well as additional development within the strategic development site and cross boundary into Waverley.

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

Attached documents: Residential and SANG Location Plan - manor Farm - 2016 07 15.pdf (624 KB)

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I wish to object to the plan for further housing development in ash and tongham.

This is green belt land and should stay that way. On top of this there is not enough schools in the area to support this. The roads are all exceptionally busy and badly maintained.

The level crossing at ash station already causes massive traffic as do the traffic lights in Normady.

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

Attached documents:

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I would be interested to know how the building of 1200 new homes can be justified which will change the character of this village beyond recognition? Fundamentally and in my opinion construction on such a large scale will:

- Create more traffic based on the assumption that to every house there are on average 2 car users.
- Have an impact on the local infrastructure putting pressure on the schools and health centre, plus shopping facilities.
- Impact on services - I personally haven’t seen any plans to support this increase in housing by providing any new shopping facilities or a much needed Post Office.
- Have a cumulative impact by adding traffic to an already busy road network - A31, A331, A323, Gridlock happens in Ash whenever there is a major incident on any of the aforementioned roads.
- Decimate the wildlife and natural appearance of the countryside.

In my opinion, house numbers should be downsized. Ash seems to take the hit every time there is talk of construction with other villages particularly to the east of the borough escaping development on this scale. Why is this?

There are approximately 3000 new homes planned for Aldershot, which neighbours Ash. All these new residents will be using and thus sharing the same road network with the additional residents in Ash. Inevitably, there will be increased road congestion.

Lets also not forget that 400 new homes are planned for land adjoining Ash Lodge Drive and further development in Tongham and this represents large scale development which will greatly affect the character and nature of this village and put pressure on infrastructure.

There must be better assurances of why this housing is needed and if so guarantees that the infrastructure is put in place BEFOREHAND so as not to make everyone's life a misery. It is appreciated that some housing, and suitable housing at that is needed but not on this scale. If I had wanted to live in the middle of a town or city, I would have moved to one.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1017</th>
<th>Respondent: 15257985 / S O'Brien</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A29</td>
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</table>

The current infrastructure cannot support the proposed development.

The Ash Vale Health Centre has no spare capacity, the existing roads are already congested at peak times, the trains are already busy at peak times, the recent development in Tongham has only just completed and the proposed increase of over 1200 houses in this area will put an impossible strain on schools, in particular infant, junior and Primary schools.

There are no local facilities for young people in Ash and the surrounding area. There are only a few park areas and the sports centre attached to the Ash Manor school is insufficient to support such a swell in population. Library opening hours are limited.

Whilst Ash Vale has a community centre and a small parade of shops, there are few designated parking facilities, which inevitably leads to on street parking which in turn causes traffic build up. There is very little parking at both Ash and Ash Vale stations, which will lead again to more parking problems.

The transport links, especially the number of buses and routes, are very limited in this area and this will inevitably lead to more cars, congestion and pollution.

In this area, there is only a small Post Office counter housed within the One Stop in Ash, this has on occasion run out of stamps. There is no Post Office in Ash Vale and to my knowledge, no plans for one.

The vastness of these proposal is detrimental to the green and open nature of this area. Ash Green will sprawl into Ash and result in a swollen population of a small village, which already has few facilities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1113  Respondent: 15262785 / Jonathan Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

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

OBJECTION

As the current occupiers of Ash Green Station, we feel well based to be able to comment on the rather strange boundaries you have created for Ash Green in the plan. You are proposing that Ash Green Road be included in the Ash and Tongham urban area. Where will the boundary be as you are proposing development on site A28? There will be no boundary between Ash and Ash Green. Ash Green actually starts North of Ash Green Road. This is where we believe the greenbelt boundary should be placed.

The amount of proposed development will detrimentally change the character of the village and change it from countryside to urban. The NPPF sites that no development should do this. Large housing developments are not in keeping with the surrounding areas and the density is vastly too high. As the current guardians of the locally listed, historic building of Ash Green Station, we feel that the historic context would be lost as we would be surrounded by and right in the middle of new housing developments, not in keeping with the village. We would end up being the buffer proposed in A29!

We believe this proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally with the main route through Ash in effect being closed 35 minutes out of every hour at the level crossing causing pinch points. We have 8 of the top hotspots for traffic congestion within Surrey in and around Ash. In the plan you suggest changes to road layouts to combat some of these issues, however it would just cause traffic to then travel through Ash Green, creating congestion throughout the entire area as well as on the main road A323. The area cannot take 1200 new homes and the thousands of extra vehicles that would inevitably come with them. The Hogs Back to Guildford at peak times is extremely congested and would again struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major routes out of Aldershot meeting the A323 at Ash), these new developments will put a strain on everything before Guildford Borough Council even start with any of their proposed developments.

Local schools, doctors and dentists are already under pressure. We currently struggle to get a doctors appointment within two weeks.

Ash Green, Ash and Tongham has a recorded history of flooding issues, with the proposed levels of development this will do nothing other than exacerbate an already major problem.

We feel it would be an incredible tragedy to lose so much of the greenbelt, which once developed, we would more than likely never get back, for us, or future generations. Under the proposed developments Ash Green would lose it's rural identity and historic boundaries. We need to protect these areas and instead redevelop urban areas and brownfield sites.

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

Attached documents:
The changes to the plan have created even more contradictions to what it hopes to achieve and what it proposes. It says that it proposes to reduce the need to travel and energy consumption and then increases the number of sites in policy A29 and the number of homes allocated to 1750+ in an area where there is insufficient wealth creation at the very edge of the borough to employ the existing population let alone these proposed new residents, thereby creating even more commuter journeys. Ash and Tongham is being considered as a town when by definition they are not since a town is a place where people not only live but also work which is patently, not the case. Ash, Tongham, Ash Vale and Ash Green should still be afforded their individual identities and would have had, if the green buffer area which is now so important between Ash, Tongham and Aldershot, had been applied to them in the recent past. The green, Tranquil buffer (4.3.34) actually sits aside 4 lanes of fast moving traffic (except at peak times when the traffic is anything but).

The increase in the number of sites in policy A29 added to A28 means an increase of new homes in excess of 1800 new homes, all on green field sites in villages already known to be the second largest urban conurbation in Guildford borough. This increase is only surpassed by the proposed Wisley allocation of 2000. It does appear that other villages within the borough are not having to give up so much of their pleasant environment as Ash, Tongham and surrounds have done in the past and now again in this amended plan, not that I have any wish to see this "chase for growth and push the debt on the next generation" attitude inflicted on anybody else.

The site allocation of policy A29 now includes areas of Ash Green to the north, south and east of Ash Green road and South of Foreman Road which the plan purports to protect without any consideration for a green buffer apparently so important elsewhere.

The amended plan purports to protect sites of historic interest yet policy A29 is in direct conflict with this given its impact on Ash Manor.

The admission that the local infrastructure doesn't meet the needs of many of its residents and is considered poor by many (para 4.6.1) will not be addressed by infrastructure improvements for only those in these new developments (policy Id1). Thereby diminishing further the living standards of the existing residents due to the blight of new development as admitted in policy Id1.

The site apportioned in policy A29 for the new road bridge to relieve congestion caused by the Ash station level crossing has been deleted and is not identified elsewhere which suggests no priority for such an important infrastructure necessity now, regardless of future development.

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

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

Attended documents:
- 160714 updated redline plan.pdf (645 KB)
- 160718 Bonnar Allan Regulation 19 representation to Guildford BC July 2016.pdf (440 KB)

Comment ID: pslp172/2819  Respondent: 15384481 / M J Levers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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

Objection to Policy Numbers A27, A28, A29 and to the map on page 301 (offices) because of lost countryside and amenity, extra traffic, more congestion (entry and exit from Guildford Road, which is already seriously congested daily), more parked cars at local shops, more pollution, more demand for local services.

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

Attached documents:

Comment ID: PSLPS16/3021  Respondent: 15433633 / Mike Allcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

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

A29 ASH AND TONINGHMAM

* Village extension: The plan envisages a rather ad hoc village extension. Preservation of the integrity of villages is generally recognised as a paramount objective of the green belt and therefore including this site seems inappropriate. This is particularly so as the 'site' actually consists of 8 separate sites

* Flooding and drainage issues are significant, and will require co-operation of adjoining land owners, that may not be forthcoming, and which are likely to delay the commencement of any development

* Boundaries require sensitive design and are not consistent with government policy of ensuring that any boundary changes to the green belt will have a degree of permanency. Of course as there are 8 separate sites, there are 8 boundaries that need to be considered

* Rail - There is a requirement for a new road bridge and level crossing - again this will impact on the timing of the commencement of development

* Traffic - significant traffic issues, including roads between the 8 sites

* Ownership - The 8 sites are under "multiple ownership".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy A29

Land to the east of Ash and Tongham Page 190

Under “Requirements,” given the volume of potential new homes, an additional bullet should be included which refers to the existing substandard junction of White Lane with A31 Hogs Back needing to be either improved or closed. Also, the current gap in the central reservation which requires traffic turning into Ash Green from the East to cross the eastbound A31 traffic is inappropriate for any material increase in traffic.

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

Attached documents:

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A29</td>
<td>Land to the South and East of Ash and Tongham</td>
<td>Tongham</td>
<td>C3, 1200 Homes</td>
<td>Adjacent</td>
<td>Jim Wood ASNW, SU895497 Unnamed ASNW,SU893500 Unnamed ASNW, SU904504</td>
</tr>
</tbody>
</table>

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

Attached documents:
Sites – most of the sites proposed for allocation are some distance from Waverley and would therefore not lead to any impacts on the Borough. However, one of these (A29) would deliver 1,750 homes in the Ash and Tongham area, an increase of 550 from the 2016 version of the plan. This includes a development at Grange Farm close to the junction of the A31 and the A331 and close to the boundary with Waverley. There is a current cross boundary planning application (WA/2017/1050) for up to 254 residential dwellings (in Guildford) plus SANG (in Waverley) on this site. As stated previously, it would be important for any impacts from this allocation, including impacts on the Thames Basin Heaths SPA to be addressed in this or any subsequent planning application.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/4986</th>
<th>Respondent: 17253473 / Ronald Large</th>
<th>Agent:</th>
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I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

   "Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

   a) The Street in Tongham
   b) A331/A323 intersection
   c) A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

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Attached documents:

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Comment ID: pslp172/1604  Respondent: 17269697 / Arthur Horner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

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Attached documents:

Comment ID: pslp172/1540  Respondent: 17270017 / John Mansfield  Agent: 17270017 / John Mansfield

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Comment ID: pslp172/1539  Respondent: 17275809 / J. Mansfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

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Attached documents:

Comment ID: pslp172/1605  Respondent: 17279329 / Pamela Horner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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Attached documents:

Comment ID: pslp172/1872  Respondent: 17289729 / Carmel Rogers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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**Attached documents:**

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Comment ID: pslp172/2654  Respondent: 17335905 / Anthony Drapper  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Please see the attached document for the concerns raised. They cover a range of issues which need to be addressed and some of the information in the local plan is based, I believe, on flawed data.

[text of attachment reproduced below]
The Addendum to Guildford Borough Proposed Submission Local Plan “June 2016” Strategic Highway Assessment Report, states that conclusions of the SHAR 2016 is that:

“The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62), and that,

“Nevertheless, the results of this assessment indicate that should the RIS schemes not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe”

Certainly for the proposed developments in and around ash, in particular the Ash Lodge Drive development will have a significant impact on already saturated road network.

Recent changes to traffic signal timings and synchronisation in Rushmoor borough at the junction of North Lane and Ash Road has had a serious impact of traffic movements and journey times to the east of the borough boundary with traffic during morning and evening peak periods impacting Ash Street, the A331 and all of the local road network around Tongham, Ash and the A31/A331 junctions.

Traffic figures provided in the consultation documents are woefully inadequate and one has to question their validity, how they have been derived and the period during which they were obtained. on the 27th June, for less that 24 hours, a series of traffic monitoring cameras were deployed in and around Tongham, the A31 and the Manor Road / Ash Street junction (Greyhound Roundabout). The purpose of the cameras was not clear (Turning movements, origin / destination journey information, traffic counts etc.) however, what benefit could be derived from any data which is gathered in a period of less than 24 hours. Also, many of the senior pupils at Ash Manor school would not have been at school as this is during the exam period. any results from these video surveys will be worthless and of no value.

It is the case every day that the schools are open that traffic along Ash Street, Manor Road, Shawfield Road and Aldershot Road are brought to a complete standstill due to the volume of traffic. This is primarily due in the morning to parents taking children to school, as parking facilities at the local schools are non-existent. Additional homes in this area will only increase this burden on the local roads even with the developers contribution as the required infrastructure and services need to be overhauled, root and branch and minimal developer contribution will not address the real needs; they are merely a gesture.

Policy A29: Land to the south and east of Ash and Tongham Capacity of the site has been increased from 1,200 to 1,750 homes.

No major impact on traffic impacts from those reported in the SHAR 2016.

The overall scale of growth in this strategic location for development has remained consistent but the capacity of the allocation for this site policy has been increased from 1,200 to 1,750 homes. The site policy now includes the various planning permissions in this area that have not yet commenced. There are no implications for the SHAR 2016 of this change.

With regards the additional 550 homes in this policy A29, how is the impact on the highways being mitigated? Detail is lacking and to what improvements are being proposed and how the benefits of any improvements have been forecast and measured.

How is it that land has cannot be removed from the Green Belt in other areas of the borough to meet housing needs. Why are locations such Clandon, Ripley, Bramley and Shackleford not sites designated for development. They have much better access to the Strategic Road Network. Is it because GBC wish to move the developments as far as possible away from the showcase of their prized town centre and hope that the residents of those new developments will work and shop across the border in Hampshire? It strikes me that the Borough Council is Cherry Picking those areas which shall and
shall not be removed from Green Belt protection based upon the class of the residents, their likelihood of complaining and the desire for the borough to remain a certain political hue.

Policy P3: Countryside

4.3.29 Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, countryside to the south and east of the urban area is allocated as a strategic location for development.

How has the sustainability of such large developments been calculated? The area is barely sustainable at the moment. What mitigations are proposed to improve an already poor level of sustainability and deliver improvements not only for the existing population of the area but for those who seek to move in to the new development.

What liaison has GBC had with Rushmoor BC to ensure that the overall developments of the two authorities do not destroy the environment and irreparably ruin an already difficult way of life for countless residents?

Local Plan, Page 212, Item 6. Why have the residents of Ash Green Road now been lumped in with Ash and Tongham. This seems ridiculous and only serves not only to upset and annoy the local residents, but also to put the borough planners in a poor light (not that it is looking to good so far).

The proposal for the bridges at Ash Level Crossing has been badly thought through. It is as if the BC is trying to make journeys through the area as difficult as possible to ensure travelers avoid the area. This is not always the case and people will have to life with this poor decision forever.

Local Plan, Page 330, What about Ash Walsh Schools. They are closer to the Ash Lodge Drive development and places here are in greater demand than Ash Grange. This needs a serious rethink.

Local Plan, Page 333. If Ash Manor school is to be expanded, serious improvements need to be made to the road infrastructure throughout Tongham, Ash and Ash Green. The values quoted in the report for developer contribution will, in no way, be enough to accommodate the expansion at these schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Further, more detailed analysis need to be done regarding existing traffic and travel related issues as the current situation is not sustainable even before developments take place.

Attached documents: [Guildford Borough Local Plan.docx](149 KB)

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**Comment ID:** pslp172/3240  **Respondent:** 17339041 / Carol Pedley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

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• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
the South and East of Ash and Tongham’. A red line location plan for the site is appended to this representation at Appendix 1.

We confirm within these representations that the site is available and deliverable within the first 5 years of the plan period and that it is set within a highly sustainable location. As such, we wish to make representations on the policies contained within the Proposed Submission Local Plan as detailed below, and the proposed strategic allocation: Policy A29.

We wish to support the progression of the Local Plan and make comments within our representations on the basis that the proposed housing numbers should be increased in line with the requirements of the National Planning Policy Framework (NPPF) to meet the full, objectively assessed housing needs of the Borough.

Land north of Grange Road, Ash
Thakeham Homes recommended the site for residential development and as such supports the inclusion of the site within the housing allocation, Policy A29: Land to the South and East of Ash Tongham’ in the Proposed Submission Local Plan. The red line for the site has been appended to this representation in Appendix 1.

Policy A29: Land to the south and east of Ash Tongham
Since the publication of the Pre-Submission Local Plan, the Council have made a number of amendments to Policy A29.

[Figure 1]
Site Area
As above, we support the inclusion of the site within Policy A29 for residential development. However, we note that the entirety of our site as actively promoted, does not fall within the proposed allocation, with a small part falling just outside. There is no evidence or justification to support the omission of this area from the allocation, and we would therefore suggest this may be in error. A site location plan can be found in Appendix 1, and we would request that the Council revise the proposed boundary shown in Policy A29 to reflect the site area for Land north of Grange Road, Ash, as promoted.

Policy A29: Requirement 9
The Council have sought to delete Policy A30: Land for new road bridge and footbridge scheme to enable a level crossing closure on A323 Guildford Road, adjacent to Ash railway station, Ash. Instead the Council have now sought to combine this with Policy A29, inserting requirement 9.

Thakeham Homes objects to Requirement 9 as there is no evidence or justification to support a new road bridge. On this basis the policy is unsound as it is not based on objectively assessed infrastructure requirements in accordance with NPPF, para 182.

The proposed wording of Requirement 9 states:

“Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station”

The objection is made on the following basis:

• **The assessment work to produce a technical justification to support this policy has not yet been undertaken.** There needs to be a fit-for-purpose assessment of future year operation of the level crossing without and with development. There is therefore currently no identification of whether the cumulative impact of development on the level crossing will be ‘severe’ or not (ref: para 32 of the NPPF). It has not been demonstrated that a road bridge option would offer any real benefit in terms of reducing journey times or queue lengths on the A323 Guildford Road.

• **Alternative options have not been tested.** Alternatives to a new road bridge could include for example traffic management, a footbridge only solution or improvement of alternative routes etc. The assessment of options needs to consider the alternatives to a road bridge and the benefits of each option weighed against their costs.
• The feasibility of a new road bridge has not been proven in engineering terms. This needs to be demonstrated, as does the practicality of timeliness of delivery given the need to cross a live rail line.

• No consideration has been given to the cost effectiveness of the solution. It is understood that the level of developer contribution is likely to run to circa £12,000 per dwelling - an unprecedented level of transport contribution, which could potentially jeopardise the delivery of other elements of development in Ash such as affordable housing.

**Infrastructure Delivery Plan (IDP)**

In relation to Policy A29 The Infrastructure Delivery Plan (IDP) references the following policies:

• LRN9: A323 Ash Road and Guildford Road (Ash) traffic management and environmental improvement scheme

• LRN11: B3411 Ash Hill Road/A323 Guildford Road (Ash) junction improvement scheme

Impacts in these locations are already apparent and in the future, are related to strategic growth. The funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

Thakeham Homes objects to IDP Policy LRN21 ‘New road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station’ for the reasons set out above.

Notwithstanding this objection, it is noted that pressure on this crossing is likely to come about not only as a result of development, but also due to increased movements on the North Downs Line, and other changes to the local and strategic road network. GBC’s identified mitigation is not solely development related and as such the funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

**Inclusion of permitted sites.**

The amendments to Policy A29, seek to include additional sites within the allocation. This includes a number of sites which currently have planning permission. These permitted sites equate to almost 700 new homes, which is a significant proportion of the 1,750 dwelling requirement indicated in Policy A29.

It is our view that the Council has failed to provide sufficient evidence or justification to support the infrastructure requirements within Policy A29, and on this basis, we consider the requirement as set out is unsound and should be deleted from this policy.

**Availability, Suitability and Achievability**

Whilst we have concerns regarding Policy A29 as detailed above, we continue to support the inclusion of this site within the strategic allocation and can confirm that the site is Available, Suitable, Achievable, and therefore deliverable within the next 5 years.

**Availability**

The NPPG provides the following guidance in regard to considering whether a site is available for development:

“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operation requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop”

NPPG Paragraph 021 Ref. 3-020-20140306

As highlighted within this representation, the site is controlled by Thakeham Homes Ltd and we will be actively engaging with the Council over the coming months prior to submission of a Full planning application for residential development.
Thakeham obtained Reserved Matters permission for the adjacent site to the north for the delivery of 26 dwellings (Planning application Ref: 16/P/00663) in December 2016, following the grant of Outline consent in December 2013.

Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and will be seeking to deliver circa 60 dwellings on the site with a view to commencing development on site at the earliest opportunity.

**Suitability**

The NPPG provides the following guidance when considering whether a site is suitable for development:

“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability”

NPPG Paragraph 019 Ref. 019-20140306

The site is located on the eastern edge of Ash village and is within walking distance of the various local amenities of Ash High Street. The Ash and Tongham Urban Area falls on the top tier of the settlement hierarchy and is therefore considered to have a range of services and facilities to meet the needs of the existing community as well as providing key services for surrounding smaller villages. The site has good transport links, with a railway station within walking distance of the site, and there is good access to bus links from Grange Road on the south western corner of the site.

The site has been submitted to and included within the Land Availability Assessment and promoted to the Local Plan, which acknowledges its suitability for residential development.

It is therefore evident from the proposed allocation and the supporting evidence including the LAA, that the site is considered suitable for development within the meaning of the NPPG.

**Achievability**

In determining whether a site is achievable for development, the NPPF provides the following guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period”

NPPG, Paragraph 021 Ref. 021-20140306

Given the acute housing need within the Borough and the proposed inclusion of the site within a strategic allocation in the Proposed Submission Local Plan, it is considered that there is a reasonable prospect of residential development being achieved on site by 2021.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period.

**Deliverability**

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. As such, we consider that the site could provide much needed housing development within the plan period and support the proposed strategic allocation Policy A29: Land to the south and east of Ash Tongham (except for Requirement 9)

**Conclusions**

In conclusion, we consider that the reduction in OAN and consequently intended housing provision is unsound, and the Council has not provided the required justification for this reduction. In particular, the intention of Guildford Borough to
not contribute to the unmet needs in the HMA is of particular concern, and we would suggest that GBC seek to accommodate the 83dpa shortfall to ensure the housing needs of the HMA are met.

We consider that some standards and requirements stipulated in the proposed policies are unjustified, and the Council should demonstrate how these conform with national policy and guidance. Where there is insufficient evidence to demonstrate a requirement for such policies, these should be deleted from the Local Plan.

As detailed above, we are actively promoting the site for residential development and we therefore support the inclusion of the site within the Strategic Allocation detailed within Policy A29. We do however object to Requirement 9 of Policy A29 as Thakeham considers there is no evidence or justification to support the proposed new road bridge. We therefore suggest that on this basis the policy is unsound as it is not based on objectively assessed infrastructure requirements in accordance with NPPF, para 182.

We have demonstrated within these representations that we consider the site to be achievable, suitable and available for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2017 07 24 GBC LP Representations Land north of Grange Road, Ash.pdf (828 KB) 2017 07 24 GBC LP Representations Land north of Grange Road, Ash - Appendix 1.pdf (122 KB)

Comment ID: pslp172/2833  Respondent: 17366721 / Marilyn Backhurst  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
1. The Street in Tongham  
2. A331/A323 intersection  
3. A31/White Lane junction  

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

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**Attached documents:**

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<th>Respondent: 17382401 / Mark Chandler</th>
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I completely oppose the increase in number of houses proposed for development, from 1200 to 1750. How can this area cope with all these homes? This will certainly push Ash Green into the ATUA and contradict entirely Policy P3 of the countryside. For this reason Requirement 6 that looks at protecting the historic location of Ash Green is not good enough and needs to be as follows....

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

I also feel that Requirement 8 does not give enough protection to Ash Manor. These collection of buildings are Grade 2 listed, once part of a historical farmstead and is steeped in history. I'm aware that the council aim to protect and enhance historical and heritage sites. The history of this site may not be widely known but there is a lot of information on this old farmstead kept in the Library of Winchester College. It's history is fully documented. I urge the council to respect and protect Ash Manor's history and amend it's draft requirements as follows....

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”
With regards to requirement 9, of the proposed bridge at Ash Station to deal with increase in traffic from potential new builds of the A29 policy, this must be in place before any development goes ahead. Otherwise there will be poor and inadequate infrastructure in place and thus the area would be unable to cope.

Requirement 9 does not take into account Tonghams’ The Street, A331/A323 intersection and A31/White Lane Junction as these roads will not cope with the even higher increase of traffic that would come from A29 development.

I would like to reiterate my strong beliefs and concerns of the Local Draft Plan. The area of Ash Green drafted into the ATUA is Ash Green and NOT Ash. We are the people that live here and for many years. We can say first hand what it is like in this rural area and we will see it slowly being destroyed. Please don’t split us in half and dissolve our rural community into an urban area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8
"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

**Attached documents:**

**Comment ID:** pslp172/3111  **Respondent:** 17392609 / Joyce Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

My next comments and objections are in relation to Policy A29. Looking at the first section of the policy, you have increased the already large amount of houses to be built in the area stated. This will completely push the ATUA into our rural area and as I have mentioned before this must be kept separated. You cannot destroy any remaining rural communities or countryside as this will be lost. Ash Green as a rural community must be protected.

You only need to look at an aerial map that views Ash and Ash Green and compare how hugely built up and compact Ash is in contrast to Ash Green which is rural homes, trees and fields. In between Ash and Ash Green you have Ash Manor which has a lot of history.

I totally appreciate the need for new homes and accept that there will be development in our community, but not on large scales and not on inappropriate land. Ash Manor (historically part of Ash Green) is not suitable as it is a group of grade 2 listed buildings surrounded by fields. Building on these fields as marked out in pink on A29 will destroy it's historical standing and heritage. A28 is more appropriate.

Please amend wording Requirements 6 and 8 to give Ash Greens historical location and rural character more protection, protect the historical Ash Manor and prevent Ash Green from being dissolved into urban Ash.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
We are supportive of the inclusion of land that currently has planning permission in the area. However, we are unclear how this land will contribute towards the requirements that are now included within this policy. With regards to the self build and custom house building plots, there is no evidence supporting the inclusion of this requirement. The Council are still at an early stage of assessing the local demand for such plots of land. There is no evidence that there is a demand for such plots in Ash and therefore we do not agree with this modification and it should be removed. The figure of 1,750 homes should not be treated as a cap and the wording amended to allow more flexibility to increase the numbers if it is found the land has greater capacity. All potential development parcels should be maximised to allow the delivery of much needed housing within Guildford Borough. The Council have reduced the housing figure by 1,400 homes over the plan period.

It would appear that the Council are not meeting the Duty to Cooperate (DTC) in reducing the housing figures; other authorities within the Housing Market Area (HMA) are struggling to meet their need; such as Woking. The Inspector for the Waverley Local Plan indicated that Waverley and Guildford should be looking to the meet the unmet need of Woking. This does not appear to have been addressed by Guildford.

(1) Appropriate financial contribution to enable expansion of Ash Manor Secondary School by additional 1FE

We would want to ensure that this contribution would not conflict with any future CIL payments that the Council may be looking to progress. We would also want to ensure that the level of payment requested is of an appropriate level for the development. As mentioned above the policy includes land which already benefits from planning permission, with an agreed sLOG. The land which does not yet benefit from a planning permission should not be expected to make up this shortfall, if any, in contributions.

(2) Appropriate financial contribution towards expansion of existing GP provision in

As above.
the area or land and a new building for a new GPs surgery

Persimmon has no comment on this. The capacity of foul water networks would be assessed as part of a planning application.

Whilst we agree that the council should include the bridge within this policy; which means that the location of the road bridge can be safeguarded to allow it to be accommodated in a more suitable and achievable location; than policy a30 was previously suggesting. Whilst persimmon do accept that in the long term a bridge will be required, alongside the closure of the level crossing. However, Council have continued to fail to demonstrate that the bridge is required in the short term and that the delivery of the 1,750 homes, within policy ‘29, requires the bridge. We note that a parcel of land that was included within Policy A30 for the delivery of the road bridge has not been included within Policy A29, to the north of the railway line. Therefore the originally envisaged road bridge alignment, as proposed by Mayer Brown, can no longer be achieved. The Council have not provided a preferred route for the road bridge. In the meantime applications for residential development continue to come forward, potentially impacting on the most appropriate location of the road bridge. The Council need to provide a clear strategy of where the preferred and, more importantly, the most suitable alignment of the road bridge should be located, with the appropriate evidence base. Within the Guildford Borough Transport Strategy 2017, there is an estimated cost of £15 million for the new road bridge and footbridge scheme. However, it is not clear what the cost includes and what alignment this takes into account. As part of the land included within Policy A29 already benefits from planning permission it is unclear how these elements will contribute towards the road bridge, if it is indeed found that the bridge is required to mitigate the effects of the housing in Policy A29. As set out in the previous representations, 15th July 2016, the funding mechanisms, outside of developer contributions, are unclear. The evidence and changes to the Local Plan do not clarify this position. Therefore it is still unclear why the Council are stating that the road bridge is ‘anticipated’ rather than an aspirational element of the policy. We note that the wording of this element of the policy calls for land and provision of the new bridges. How this will work in practice is still unclear. If land is being provided by a party for either of the bridges then the level of monetary contribution needs to be considered against this. As set out in Persimmon Homes' representations dated 15th July 2016, an area of land will be safeguarded for delivery of a footbridge within land controlled by Persimmon, with the remaining land coming forward for residential development. This would then allow the road bridge to be delivered within the wider policy area, meaning that an appropriate location can be secured and allow the Design Manual for Roads and Bridges standards to be met; which the previous alignment did not allow for.
<table>
<thead>
<tr>
<th>Key considerations</th>
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<tr>
<td>(4) Height and layout of road bridge and footbridge</td>
<td>(4) The Council need to provide guidance on the location and mechanism for delivery, as detailed above and ultimately if the bridge is required due to the impact of delivery of policy A29.</td>
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<td>(11) Potential noise and air quality issues</td>
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<td>(12) Proximity to ancient woodland/ SNCI</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:** pslp172/3404  **Respondent:** 17408897 / A Cobb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **Legally Compliant?** ( )

The proposed 1750 new homes are far too many properties for the area to absorb and will result in the coalescence of the villages which seek to keep their own characteristics and individualism. Further development in Ash Green must protect the historic value to the area. Of particular importance is Ash Manor and the buildings in close proximity to it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/4796  **Respondent:** 17411617 / Graham James Whitehead  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **Legally Compliant?** ( )

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and
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- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

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Attached documents:

Comment ID: pslp172/3547  Respondent: 17416545 / Paul Finning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal for 1200-1750 homes is completely out of character for Ash Green and will coalesce Ash, Tongham and Ash Green losing a beautiful countryside location which is completely contrary to Policy P3 Countryside mentioned.
above. Any development in this area should be of a size and scale which keeps the intrinsic character and rural character of these sites.

Policy A29 Requirement 8 doesn't allow for the right level of protection for Ash Manor, a set of three listed buildings, and should be tightened to prevent developers from spoiling views, setting and driveway approach from White Lane. Listing buildings do not sit nicely against poorly specified and designed housing estates so something more appropriate is called for.

I'd like to highlight again the need for infrastructure before development here as the local roads are used as a rat run and are already under great pressure due to approved developments. Planning approval in this area should be predicated on the completion of the the following improvements:

1. Ash Station  
2. The Street Tongham  
3. A331/A323 Intersection  
4. A31 White Lane Junction

Ash Green is not and should not become part of the Ash and Tongham Urban Area.

Sustainable transport needs further work. Walking from Ash Green to Ash Station is downright dangerous. Cycling to Guildford as I do is only something for the most experienced cyclist and nobody new is going to do it as it's life threatening every day. The bus service is infrequent and no use for commuting. Where is the provision to improve this stuff coming from? Sustainable transport is not at the forefront of the plan and should be far more prevalent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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| These policies provide no provision for community spaces such as a village hall or larger recreation area. It's disappointing that the plan has nothing in this area for local people when it's absolutely trying to cover this land in houses leaving us nothing.

I object to the fact that the plan is trying to build so many houses in one area of Guildford's borough. It is not fair to push all development into one place and it would be far fairer to spread it out across the borough. I'm not against having development on my doorstep just not what I consider to be a large amount of it which is out of proportion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy 29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. a) The Street in Tongham
2. b) A331 / A323 intersection
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Attached documents:

Comment ID: pslp172/3635  Respondent: 17423617 / David Middleton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence between the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

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- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

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Attached documents:
Policy A29: Land to the south and east of Ash and Tongham

The borough is required to build a number of houses within a timeframe but they should not all be in the same area. Houses are slow to sell so where are all the people or the proposed for 1200-1750 homes? This is completely out of character for Ash Green and will lose a beautiful countryside location which is completely contrary to Policy P3 Countryside mentioned above. Any development in this area should be of a size and scale which keeps the intrinsic character and rural character of these sites. The site is just north off the Hogs Back but should be better protected as it is to the south.

As a resident of Ash Green, I believe that Policy A29 Requirement 8 doesn’t allow for the right level of protection for the historic Ash Manor, a set of three listed buildings and Ash Grange. More protection should be within the requirements of this policy to prevent developers from spoiling the integrity of these listing buildings. They should not be forced to sit against poorly specified and designed housing estates so something more appropriate is called for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3867  Respondent: 17433729 / Ian Price  Agent: 1060

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Anyone who visited this area would be able to see the proposed increase in housing would be detrimental to this area. I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals near Ash Green to have recognition of the historic location of Ash Green village and Manor and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development must not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built-up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- **Infrastructure before development.**

  - Please note that Infrastructure is not just roads! This area has poor facilities for its current residents. Water, Gas, Sewage, Electricity, Shops, Doctors, Schools are all currently under stress, or in short supply.
• Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) and many other improvements must be completed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Road solutions to the following areas are also required before any development of A29 is permitted.

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Attached documents:

Comment ID: pslp172/3878  Respondent: 17433985 / Stephen Pedley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence. Moreover, this number of houses, together with the many thousands more being built in neighbouring boroughs will put an pressure on our local infrastructure that it cannot sustain.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”
• Ash Manor has a rich history dating from its entry in the Doomsday Book. It has been owned by several kings and has witnessed foul deeds and intrigue. Some historical documents refer to the Manor as a Palace. This is a building of great significance to our local history and its setting is as much part of this history as the building. We have a moral duty to protect this site for the enjoyment of future generations. I believe the requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house, and should be amended as follows:

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**Attached documents:**

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**Comment ID:** pslp172/4071  **Respondent:** 17447297 / T Scott  **Agent:**

| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

• I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

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Policy A29: Land to the south and east of Ash and Tongham

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1. Policy A29: Land to the south and east of Ash and Tongham (Cont.)

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”.

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“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”
I object to the proposed increase in homes (1200 -> 1750) which would result in the development of a single urban
dormitory town with few facilities and the complete erosion of the unique characteristics of Ash Green.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy A29: Land to the south and east of Ash and Tongham
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<th>Respondent: 17467457 / Emily Henderson</th>
<th>Agent:</th>
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I am writing to object to the 2017 proposed submission of the Local Plan.

OBJECTION TO SITES A28 & A29 AND THE PROPOSED CHANGE TO ASH GREEN BOUNDARIES

I believe the title of Policy A28 needs to be corrected to say “Ash Green” not “Ash”.

Policy A28: Land to the east of White Lane, Ash GREEN, states it requires
“(2) Sensitive design at site boundaries that has regard to the transition from urban to rural
(3) No unacceptable impact on trees and ancient woodland
(4) Recognition of the historic location of Ash Green village”.

However I believe the Local Plan (Policy A28) will impact on trees and ancient woodland within the site and does not recognise the historic location of Ash Green village. I have outlined evidence to support my beliefs below.

As the current occupier of Ash Green Station, I feel well based to be able to comment on the rather strange boundaries Guildford Borough Council has created for Ash Green in the 2017 plan. GBC are proposing that the houses of Ash Green Road along with the land south of this up to and including site A28 be included in the Ash and Tongham Urban Area (ATUA), which is historically Ash Green. There will be no boundary between Ash and Ash Green. Ash Green starts on land North of Ash Green Road (part of the proposed A29 development), a fact which seems to have been ignored by placing A28 into the proposed ATUA. I believe the countryside boundary should be placed along Ash Green Road as a minimum but ideally allowing for a buffer into the field south of Ash Manor but north of Ash Green Road, with A28 left as countryside, not shoe-horned in as part of the proposed plans.
The more appropriate, natural defensible boundaries would be either along the old railway line or preferably, along Ash Green Road, which would retain Ash Green village and station in its historic location.

The Ordinance survey map as shown in GBC own Greenbelt and Countryside Study names Ash Green both to the north of the old railway line as well as the south. (see below)

As can be seen on this historic O/S map, circa 1920 there were no buildings mapped in Ash Green to the south of Ash Green Lane East, the only properties in Ash Green were those to the north of the railway cutting. Buildings specifically named are Ash Green Station and Ash Green Farm, with the ancient woodland of College Copse running from the railway cutting to Ash Green Lane (east). Ash Green (modern estate) (to the south of Ash Green Lane East) was not the original Ash Green, but had started to appear by mid 20th century, as this map shows circa 1944. The entrance to Dene Lodge through the ancient woodland marked as College Copse has been mapped, showing that the whole of site A28 was originally covered by College Copse. A portion of the remainder in A28 is now classed as ancient woodland, therefore we believe any trees north of the ancient woodland on A28, especially on the western boundary of A28 adjoining White Lane to the railway cutting be treated with a high degree of sensitivity as they are growing on land which once formed College Copse.

In addition to the above maps in relation to the boundaries of Ash Green village, this image from 1977 shows signage indicating Ash Green is to the north of the railway cutting as well as to the south.

I would also like to bring to attention that the bus stop north of the railway line outside the old station on White Lane is referred to as “Ash Green, Old Station”.

I wholly agree with your statement in the local plan (below)

Section 3 Spatial Vision, which states:
”Further development is also proposed in and around Ash and Tongham on land beyond the Green Belt along with new green belt designated to prevent Ash and Tongham merging with the village of Ash Green.”

I wish to see historic Ash Green comprising Ash Green Road and Ash Green Station included as part of the area of separation.

I feel the locally listed building of Ash Green Station under the proposed plans would lose its historic context of actually being in Ash Green. It is a ‘Heritage asset’ as defined by the NPPF; “A building, monument, site, place, area or landscape identified as having a degree of significance meriting considerations in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)”. The NPPF also states “Significance derives not only from a heritage asset’s physical presence, but also from its setting”. I believe Guildford Borough Council needs to give more consideration to Ash Green Station and its historical setting.

As stated in Policy D3 below: Historic Environment.

”(1) THe will conserve and enhance the historic environment will be conserved and enhanced in a manner appropriate to its significance. We will support dDevelopment of the highest design quality that will sustain conserve and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported.

(2) Heritage assets are an irreplaceable resource and 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. “ The proposal to remove historic Ash Green from Ash Green goes against the NPPF policy contained within the Local Plan (as shown below), which GBC says it will adhere to. “ 4.5.43 We will ensure that dNew development must will conserve heritage assets in a manner appropriate to their significance. The NPPF defines significance as “The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.” The contribution of the setting of heritage assets to the appreciation of these qualities will be carefully considered alongside more direct impacts of development proposals.”
The proposed changes would remove Ash Green Station (locally listed) and Ash Green Road out of Ash Green, as well as the historic housing of the Ash Green area. By developing A28 there is also potential to lose the aforementioned ancient woodland within A28 as well as detracting the original setting of The Old Station. A29 also goes against this policy and NPPF guidelines by placing Grade II Listed Ash Manor and associated buildings in the centre of a modern housing estate. Policy D4: Character and design of a new development states that
1) High quality design is expected in the borough. All developments will:
   (l) conserves locally and nationally important heritage assets and conserves or enhances their settings
   (m) has 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.

By moving Ash Green village boundary (l) would not be complied with. A28 would also have an impact on Dene Lodge (locally listed building) and A29 (south of Ash Green Road) would impact on the setting of Woodberry (also locally listed). Development of A29 around Ash Manor would impact the historic settings of Ashe Grange, Ash Manor, Old Manor Cottage, The Oast House, Stable and The Barn to the south of Ash Manor, all Grade II listed properties. In reference to (m), development of A28 has the potential to block sunlight, reduce privacy and increase noise at our property, due to the unusual fact it is built into a railway cutting and as a result it is below the ground level of A28. Station house ground floor only has windows on the southern side of the house (as the northern side is built into the bank), therefore the horizon for our southern aspect on this floor has a much lower effective horizon and as a result the sun only just reaches our windows in winter months. If development occurs on the northern boundary of A28 it could well result in the complete blocking of natural light to the property on the ground floor. Station House suffers from an unusual phenomenon in that sound reverberates and travels along the old railway cutting. We often hear the noise of trains on the current line in our house, even though it is some distance away. We have concerns that noise from A28, A29 and A31 will carry along the cutting in the same way.

As can be clearly seen on the map below, sites A28 and A29 to the south of Ash Green Road really don’t make any sense in terms of preserving historic Ash Green and should be removed from the plan. The buffer zone to separate Ash from Ash Green should be placed on the land to the north of Ash Green Road up to and around Ash Manor to compliment and preserve its well documented historic setting.

With the proposed southern extension of A28 it will potentially require the felling of trees and the destruction of the ancient woodland of College Copse up to the driveway of Dene Lodge. If A28 and the area of A29 south east of Ash Green Road are removed from the Local Plan it will provide obvious continuity to the natural defensible boundary for the countryside (the ancient woodland which bounds the eastern edge of A29 should be included in this) thereby preventing the urban sprawl of Ash and merging of Ash Green into the ATUA. I also object to some of the current and proposed wording in the plan. I believe Policy P3: Countryside, 4.3.29 should be amended to “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development”. This is because I think infrastructure is greatly lacking, especially in relation to roads, traffic and public transport.

I believe 4.3.30 should be amended to “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green”.

I think it is vital this sentence be included in the plan as there is a real danger with the current proposed sites of A28 and A29 losing Ash Green’s historical location and identity.

I believe Policy P3: Countryside (1)(c) should be amended to “does not lead to greater physical or visual coalescence between Ash Green, the Ash and Tongham urban area and Aldershot”, in order to protect Ash Green as a separate village.

I believe Policy A29: Land to the south and east of Ash and Tongham, Requirements (6) needs to be amended to protect Ash Green village and the houses within it. As I have pointed out and evidenced with maps, Ash Green Station and the houses along Ash Green Road formed the village of Ash Green before the more modern buildings south of the railway cutting appeared, and therefore it is indefensible that GBC want to remove the buildings that originally formed Ash Green village from Ash Green.
I believe the wording needs to be “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the build up area and the countryside beyond”. The wording in Policy A29, Requirements (8) does not offer enough protection to the Grade II listed buildings of Ash Manor and their surroundings, and therefore should be more specific and say “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor.

Approaches and views to, from and around this heritage asset must be protected.” In Policy A29, I believe Requirements (9) of a new road and footbridge should be in place before any development of A29 commences and the wording should reflect this. Also requirement (9) does not address the other significant transport infrastructure improvements that are required to cope with the huge increase in traffic created by Policy A29. According to the NPPF guidelines Ash Green is not a suitable location for sustainable development because it has no shops, doctors, community facilities and its public transport infrastructure is very poor. Guildford Borough Council’s own Settlement Hierarchy ranks this as the least sustainable location in the borough. Site A28 lies within Ash Green and therefore should be removed from the Local Plan.

Local schools, doctors and dentists are already under pressure. I currently struggle to get a doctors appointment within two weeks.

I believe the proposed level of development is fundamentally flawed as there is a huge lack of infrastructure - a practically non existent bus service, no real means to safely get to Ash station (there is little option other than to use a car, either to get to the station or elsewhere), and already major congestion on local roads. Ash Green does not have a suitable transport network - we are not set up to take more residents and therefore more traffic. There are already huge delays and traffic jams locally. We have eight of the top hotspots for traffic congestion within Surrey in and around Ash. The Hogs Back at peak times is extremely congested and would struggle with any increase in volume.

Are Guildford Borough Council in correspondence/consultation with Hampshire County Council regarding the new building developments in Aldershot and the surrounding areas? We share bus, rail and road services (with one of the major routes out of Aldershot meeting the A323 at Ash), these new developments in Hampshire will put a strain on everything before Guildford Borough Council start with any of their proposed developments. Ash Green, Ash and Tongham has a long recorded history of flooding issues. With the proposed level of development this will do nothing other than exacerbate an already major problem. Our house currently suffers the effects from poor water drainage as the railway cutting is used for local surface water drainage. I have serious concerns that major development around us could lead to further issues regarding flooding.

Where would the proposed entry and egress points be for site A28? White Lane would be awkward and dangerous as it has a blind crest on the bridge to the north and a slight curve in the road to the south. Drovers Way is not designed to take this level of traffic. The junction of White Lane, Ash Green Road and Foreman Road has a history of accidents and a development on A28 would potentially add to this problem with increased traffic levels.

I feel it would be an incredible tragedy to lose such a wonderful greenfield site, which once developed, we would never get back, for us, or future generations. Under the proposed developments Ash Green would lose its rural identity and historic boundaries. We need to protect these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development”

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“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village.

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“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Approaches and views to, from and around this heritage asset must be protected.”

Attached documents: [Henderson Objection to Local Plan (2).pdf](#) (1.6 MB)

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4321</th>
<th>Respondent: 17467457 / Emily Henderson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Attached documents:

**Comment ID:** pslp172/4831  **Respondent:** 17484449 / Thames Water Utilities Ltd (Sir or Madam)  **Agent:** Savills (Richard Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
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<tbody>
<tr>
<td>42320</td>
<td>A29 - Land To The South and East Of Ash and Tongham</td>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/4795  **Respondent:** 17497377 / Stephen Holmes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any
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- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

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Attached documents:

Comment ID: pslp172/4984  Respondent: 17500833 / Christine & Philip Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

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: pslp172/5024  Respondent: 17505345 / S.E. Marston  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countrywide). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31 /White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green..."
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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3119</th>
<th>Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent: Vail Williams LLP (Jane Terry)</td>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
</tr>
</tbody>
</table>

| Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No ) |

The schedule of sites at page 143 of the Submission Local Plan and at Policy A29 itself, indicates a change to the quantum of development proposed for this Strategic Site from 1200 to 1750 dwellings. This is to take into account permissions already granted but which have not yet been delivered due to a shortage of SANG provision. Recognition of this is supported as is the proposed change to the Ash and Tongham Inset Plan (Amendment 10; Ash and Tongham) indicating the inclusion of already consented sites within the Strategic Site boundary. However, objection is made regarding the overall quantum of development proposed at A29 which is currently couched essentially equates to a cap on development ‘approximately 1,750 homes’ but which could be augmented further subject to detailed planning and design. In regard to Sustainable Development, the NPPF states at paragraph 14, that:

“For plan-making this means that:
- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”

Further, one of the Core Planning Principles at paragraph 17 of the NPPF states that planning should:

‘Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.’

As an example, through detailed planning, land to the west of The Street (SHLAA site 2247) could accommodate a further 50 units. This would reflect Criterion m) of Policy D4 reflecting the need to make the most effective use of available land; it would contribute towards the overall shortfall in supply indicated in the first five years of the Plan; it would contribute towards reinstating the Borough’s objectively assessed housing need to that required through the 2015 SHMA; secure an adequate five year housing land supply and it would contribute towards the Borough’s Duty to Cooperate with its neighbouring authorities in meeting the otherwise unmet needs across the HMA.

It is not therefore considered as currently drafted, that the Proposed Submission Plan reflects the key national requirement for housing growth and a revision to the Policy to either ‘for a minimum’ or ‘at least’ x homes is therefore required.

Policy A29 also seeks the inclusion of an element of self build and custom house building plots. The Government has indicated a commitment to self-build and custom house building plots and there is a requirement for local authorities to keep a register. However, the Government has not yet finalised its stance or published policy in relation to the specifics of
the initiative. With the impact of the Brexit referendum and new Government, delays have been introduced, not least in the amendment and republication of the NPPF. Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance and self-build and custom housing could be required in due course, in the same way as affordable housing is required within housing developments.

Further, there is little evidence as to the extent of demand for self and custom built houses within the Borough currently. According to the GBC Housing Mix Topic Paper there are 87 individuals on the register in the first base period and 80 who are seeking plots of land in the Borough. Whilst it is recognised that this is a snapshot, it is a very small number across the 19 year plan period - equating to just 4 per annum. The West Surrey Strategic Housing Market Assessment 2015 considered self build opportunities and considered that whilst there could be potential to designate plots within larger schemes, most new delivery would be on small windfall sites.

The Topic Paper goes on to state that there is no definitive number of self-build or custom housebuilding plots sought but that the approach that Guildford Borough Council has taken is to seek flexibility by specifying their inclusion on suitable site allocations over 100 homes. The draft policy within the focussed Proposed Submission goes further than this and specifies that 5% of the total homes shall be available as self-build and custom housebuilding plots ‘whilst there is an identified need’. This approach is both unfounded and arbitrary: There is no basis for the selection of sites of over 100 units in size particularly bearing in mind the conclusion drawn in the SHMA that the majority are likely to come forward on small windfall sites; or the selection of the 5% requirement - the need for which the lpa itself acknowledges is uncertain: ‘whilst there is an identified need’. This level of uncertainty will have an adverse impact on development decisions.

We therefore object to the inclusion of the the requirement for self-build and custom housebuilding at this stage of the Plan making process as being unsound based on inadequate evidence, prematurity in pre-empting confirmation of the Government’s future policy specifics and the level of uncertainty introduced which will have an adverse impact on development decisions. Consequently the policy will be ineffective.

Further to the above discussion, the following modifications to Policy A29 are sought:

i) It is recommended that the quantum of development within the strategic site A29, Land to the south of Ash and Tongham be reviewed to ascertain additional capacity.

ii) At least an additional 50 units to be added to the capacity of land to the West of The Street, Tongham (former 2016 SHLAA site 2247). Reason for the uplift: Reconsideration n the light of further evidence and understanding of potential capacity.

The Policy should therefore be redrafted as follows:

‘Policy A29: land to the south and east of Ash and Tongham

Allocation: This is a strategic location for development. The site is allocated for approximately 1,750 at least 1,800 homes, including some self-build and custom house building plots (C3).’

The Policy also indicates a number of requirements within the Strategic Site. The requirements listed relate variously to the whole Site Allocation and various constituent sites within the overall Strategic Site. This is both confusing and misleading and creates uncertainty which should be avoided.

In particular, Requirement (9) requires land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station. Whilst the aims of the policy can be supported in general terms, this requirement does not relate to all of the constituent sites within A29. Objection is made accordingly on the following grounds:

(9) Land and provision of new road bridge

The Land allocation at Ash and Tongham covers a wide area with very different characteristics and as such the impacts on the local highway network differ considerably between the identified land parcels and as such not all ‘Requirements’
are directly related to each of the land parcels identified, i.e. the impacts of sites in Tongham and very different to those in Ash.

As has been shown through the planning applications submitted at Land North of Grange Road, Tongham (ref: 17/P/00529), Land South of Grange Road, Tongham (ref: 14/P/02398) and Land at Manor Farm, The Street, Tongham (ref: 16/P/00222) the impact in traffic terms at the existing level crossing is de-minimis and has never been raised as an issue by either Guildford Borough Council or Surrey County Council as the Local Highway Authority.

On the basis of SCC’s review of applications in Tongham, it is evident that a new road is not necessary to support the delivery of the Allocation sites in Tongham.

Notwithstanding the de-minimis impact from the Tongham sites it is evident from the transport evidence base which accompanies the emerging Local Plan that:

a) No detailed study has been undertaken on the need or justification of any new bridge crossing. A fit-for-purpose assessment of future year operation showing the impacts with and without development is required identifying the cumulative impact and whether development identified in Policy A29 would cause a ‘severe’ impact (ref: para 32 of the NPPF).

b) No alternatives to a new bridge crossing, such as improving alternative routes, traffic management or a footbridge only solution have been considered in detail, or any cost benefit analysis provided. As such, the delivery of a new bridge and closure of the level crossing is merely to meet an aspiration of GBC which is not soundly founded on robust evidence.

Requiring the Tongham land parcel to assist with the provision of the delivery of the A323 Guildford Road level crossing does not meet the tests in Paragraph 32 of NPPF where any mitigation should cost effectively limit the impacts of development. A ‘generic’ approach to collecting an unprecedented level of transport contribution over the whole allocation towards a scheme which is yet to be justified in transport terms is therefore not Fair and Reasonable and does not meet the requisite tests.

On this basis, in our view, Requirement 9 should be removed from Policy A29 Requirements, as this is;

a) Linked to an aspirational scheme which is not based on robust evidence and is not therefore considered to be sound;
b) Is unlikely to offer any real benefit in terms of reducing journey times or queue lengths on the A323 Guildford Road, and

c) If it can be justified, it will predominately be due to the increased frequency of trains on the North Downs Line, and the closure of other local junctions such as the junction of White Lane and the A31 Hogs Back, which are not related to the delivery of housing at Ash and Tongham i.e. any ‘need’ comes about through the delivery of strategic aims within the plan and not solely as a result of the proposed allocation.

Should GBC wish to continue with the aspiration of a replacement bridge as a strategic infrastructure project then it should be retained as Policy A30, as presented in the previous iteration of the emerging Local Plan.

Alternatively, should it be retained within Policy A29, it should be relocated to the ‘Opportunities’ section of the Policy and clarity should be provided within the Policy to identify that Requirement 9 is not related to the delivery of the Tongham sites.

Policy A29: Land to the south and east of Ash and Tongham

Requirements: (9) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station.

Under the ‘Key Considerations’ section of Policy A29, consideration (11) recognition should be made to the ability for potential noise and air quality issues to be ‘designed out’ through good planning and design.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Suggested amendment: 'Policy A29: land to the south and east of Ash and Tongham

Allocation: This is a strategic location for development. The site is allocated for at least 1,800 homes (C3).'

Removal of Requirement 9 from Policy A29.

Attached documents:

Comment ID: pslp172/4322  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document: complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ( )

SITE ALLOCATION A29: LAND TO THE SOUTH AND EAST OF ASH AND TONGHAM

The schedule of sites at page 143 of the Submission Local Plan and at Policy A29 itself, indicates a change to the quantum of development proposed for this Strategic Site from 1200 to 1750 dwellings. This is to take into account permissions already granted but which have not yet been delivered due to a shortage of SANG provision. Recognition of this is supported as is the proposed change to the Ash and Tongham Inset Plan (Amendment 10; Ash and Tongham) indicating the inclusion of already consented sites within the Strategic Site boundary. However, objection is made regarding the overall quantum of development proposed at A29 which is currently couched essentially equates to a cap on development ‘approximately 1,750 homes’ but which could be augmented further subject to detailed planning and design. In regard to Sustainable Development, the NPPF states at paragraph 14, that:

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Further, there is little evidence as to the extent of demand for self and custom built houses within the Borough currently. According to the GBC Housing Mix Topic Paper there are 87 individuals on the register in the first base period and 80 who are seeking plots of land in the Borough. Whilst it is recognised that this is a snapshot, it is a very small number across the 19 year plan period - equating to just 4 per annum. The West Surrey Strategic Housing Market Assessment 2015 considered self build opportunities and considered that whilst there could be potential to designate plots within larger schemes, most new delivery would be on small windfall sites.

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The Policy should therefore be redrafted as follows:

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The Policy also indicates a number of requirements within the Strategic Site. The requirements listed relate variously to the whole Site Allocation and various constituent sites within the overall Strategic Site. This is both confusing and misleading and creates uncertainty which should be avoided.

In particular, Requirement (9) requires land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station. Whilst the aims of the policy can be supported in general terms, this requirement does not relate to all of the constituent sites within A29. Objection is made accordingly on the following grounds:

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Policy A29: Land to the south and east of Ash and Tongham

Requirements: (9) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station.

Under the ‘Key Considerations’ section of Policy A29, consideration (11) recognition should be made to the ability for potential noise and air quality issues to be ‘designed out’ through good planning and design.

1. Policy 12a section

Additional requirement 12 relates to the provision of a green buffer to minimise the noise and air quality issues adjacent to site A31 and A331.
In relation to air quality issues the recent AECOM assessment confirms that air quality is not a restrictive matter. Further, in terms of noise issues these can be dealt with in a number of ways including a range of mitigations measures to include detailed building design, layout design and a suitable standoff.

These matters can be suitable dealt with at the detailed planning stage.

A green buffer is therefore not required. It is therefore recommended that requirement 12 is not required and should be deleted from the emerging policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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ii) At least an additional 50 units to be added to the capacity of land to the West of The Street, Tongham (former 2016 SHLAA site 2247). Reason for the uplift: Reconsideration n the light of further evidence and understanding of potential capacity.

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Recommended Changes to Policy A29: Land to the south and east of Ash and Tongham
Requirement: (9) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station.
Requirement 12: Green buffer to minimise potential noise and air quality issues adjacent to the A31 and A331.

Attached documents:

**Comment ID:** pslp172/4956  **Respondent:** 17616161 / Kevin & Susan Fealey  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will
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  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road/White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

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Attached documents:
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: A30 - Land for new road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station, Ash
I have the following comments on Site A30 - Ash station railway bridge. The land on both sides of railway between the diverted road via the new bridge and the existing Guildford Road should be used for additional car parking for station users and a pick up/set down area plus relocated bus stops close to the station entrance(s).

Ash station could be developed as park and ride by train facility for commuters and others travelling to Guildford and Reading (and also London via Guildford). Car parking should be free (or a nominal amount as at Ash Vale - £1 per day), and not at the level of £3.50 weekdays as currently charged by South West Trains, which is a disincentive to use the car park when paid in addition to the train fares. This is shown by the current level of on-street commuter parking near Ash station and regular vacant spaces in the 22 space station car park.

Some of the surplus land in the A30 area could be used for a new convenience store (with some time limited parking) to serve the new developments already approved and built in south/east Ash and likely to be built in the areas in Site A29. By siting a convenience store close to the station, it would be a useful facility for rail users as well as local residents and could reduce the number of car journeys - i.e. a rail user could visit the shop before leaving the car park, instead of having to drive to a shop some distance away, and then onto their home. Existing shopping facilities in Ash - both in Ash Street, at Ash Vale (Wharf Road) and on Guildford Road depend on on-street parking with limited off-street parking with consequent congestion. The new Tesco convenience store close to Ash Vale station appears to be well used, and is in an area with a limited number of shops nearby.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Ash Vale station is an example where there is inadequate parking provision (all the available places are filled by 7.00am on weekdays) and because of close by housing there is no land available for additional parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4533  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A30 Ash Road bridge

Comment: Whilst we welcome the improvement to the rail crossing for safety reasons. We are concerned about the flow rate onto the Aldershot Road into Guildford through Worplesdon. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity. Therefore, some means of controlling the traffic would need to be introduced to mitigate the increased impact of traffic on the highway network through Worplesdon and the impact on accesses onto Aldershot Road (A323).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4209  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A30

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Scheme removed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4184  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 193. Policy A30: Land for New Road Bridge and Footbridge Scheme to enable Level Crossing Closure on A323 Guildford Road Adjacent to Ash Railay Station. Ash Allocation -After station, add 'A new off-street car park will also be provided'.

Level Crossing Closure on A323 Guildford Road Adjacent to Ash Railay Station. Ash Allocation -After station, add 'A new off-street car park will also be provided'.
Requirements - Second, third and fourth requirements should be:

'A new off-street car park will also be provided on the north side of the railway to the east of A323 Church Road to serve additional residents in the general area and to reduce problems caused by parking on nearby roads. The new car park will be landscaped and secure. It will be funded by contributions from developers and/or Guildford Borough Council in view of the need to address travel problems which will arise from the Council's policies of adding new homes in the area (1200 in Ash and Tongham)'.

'High standard cycle routes will be provided, on and off the highway, to encourage cycling to the station and to help the safety of cyclists.'

'Traffic signals will help pedestrians and cyclists to cross the A323'.

Note: If these additional requirements are not added to Policy A30, there is a risk that they will be delayed or even overlooked. They are fundamental requirements and they should be included in the policy (although, of course, different wording could be used).

There is no indication of a new road at this site to serve the homes proposed between Harpers Road, the A323 and the railway line. Should this not be shown on the site drawing on page 194, to ensure co-ordination of plans? As mentioned on page 20 of this letter, Harpers Road and Wyke Lane etc are not suitable for increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6678  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A30 Ash Road Bridge

Comment

It is difficult to see how a bridge over the railway at this point will be achieved as a minimum clearance of 5m needs to be achieved. With a gradient of the road of say 1 in 20 and a structural build of 1m (minimum) a ramp would need to be 120m long to both sides of the railway. The land allocated for this proposal does not appear to be sufficient.

Whilst generally understanding the need for a bridge, I am concerned with the impact on the flow of traffic on the Aldershot Road. The current level crossing acts as a constraint on the traffic and drivers take notice of it by allowing time to get across the level crossing. By providing a bridge the constraint will be removed and drivers will leave later causing congestion at a later point along the Aldershot Road. The likelihood is that the Rydes Hill roundabout will be further congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6679  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

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: PSLPS16/394  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support - although traffic flows and volumes in Worplesdon will need monitoring

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3352  Respondent: 10958337 / David Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A30
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I do not agree with the removal of this provision for a bridge instead of the existing level crossing. As noted above, this is already a traffic pinch point, and given the size of the proposed development on A29, additional vehicles will be using Forman Road, which joins the A323 at the exiting level crossing. I would like to see this re-instated, together with a better junction for vehicles wanting to use Forman Road. I accept that this will cause land to be used for infrastructure rather than housing but given the area of land assigned to A29, I believe this is an acceptable trade-off. Get Surrey are reporting that First-MTR (the new operator for the South West area of the National Railway) are intending to re-introduce a dedicated Guildford – Farnham rail service (see http://www.getsurrey.co.uk/news/surrey-news/south-west-trains-franchise-farnham-12844991), which would presumably increase the number of times that the level crossing barriers were down in a day and therefore cause further disruption to the traffic flow in that area.
- If this scheme were re-introduced, I would like to see it extended to facilitate improvements to the junction between the A323 and the B3411, which is another traffic pinch point in the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/974  
**Respondent:** 15256545 / Maaike Zaagsma  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>I would like to see a design plan for this proposed new bridge carrying the A323 across the railway at Ash which will replace the level crossing. At present I cannot visualise what it will look like and thus what impact it will have on the surrounding area. My concerns are that it will INCREASE traffic through an already busy and sometimes gridlocked village and that more HGVs will enter the village. Furthermore it may also be out of keeping with the area. Additionally, the area set aside covers land east of Foreman Road. I thought that Persimmon Homes wanted to build houses there so how exactly will that work? Persimmon homes have only recently distributed a pamphlet advising of plans to build 50+ homes on the aforementioned site. Interestingly, Copperwood Developments who propose 154 dwellings on land to the south of Guildford Road say that land is (quote from their literature) ‘reserved to accommodate the Council’s future flyover’. I was of the belief that infrastructure HAS to be in place BEFORE new housing construction? The wording suggests that building will go-ahead before infrastructure is in place.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1149  
**Respondent:** 15272929 / roger kendall  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

<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>A road bridge would a great improvement, subject to good access to the industrial site, which provides much small business employment and shielding of the houses nearby from being overlooked by the road. It would be better to have proper houses not a traveler site. The industrial site would benifet from extra parking for the businessess employees and visitors.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Total records: 11.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy A31 - Land north east of Spoil Lane, Tongham

No representations received for this section.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: A32 - Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8115</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A32</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>A32: Surrey Police Headquarters, Mount Browne</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Object to erosion of AONB or removal from Green Belt</td>
<td></td>
<td></td>
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<tr>
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<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2858</th>
<th>Respondent: 8557985 / Artington Parish Council (Philip Gorton)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A32</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>Re-development of Mount Browne</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mount Browne has been assessed as an area of 'high sensitivity'. The potential development of 116 houses or of commercial redevelopment on Mount Browne would constitute a major development for this site. Paragraph 116 of the NPPF states that planning permission should be refused for major developments in AONB designated areas unless exceptional circumstances are demonstrated. The plan and GBCS Volume V provide no evidence of exceptional circumstances to support such major development or removal from the Green Belt. The re-development of this rural site could have a major impact on the open character of the area that lies between the North Downs and Farncombe be and also between Guildford and Godalming. This area is clearly visible from adjacent areas and is treasured by local residents, the larger community and visitors to the area. Mount Browne and the adjacent University of Law are regarded are an essential part of the green lung’ which separates Guildford and Godalming. They represent the first line of defence against the risk of urban sprawl. It is crucially important to ensure that it remains essentially open in character and be protected by AONB and Green Belt planning guidelines and constraints.</td>
<td></td>
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</tr>
<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: pslp172/3926</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
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</thead>
<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>
</tbody>
</table>
Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford – we recognise this is likely to come forward for development and we support a carefully designed and scaled development providing a small hamlet or village nestled in the Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8284</th>
<th>Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
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Ancient woodland adjacent. Your draft policy A32 erroneously states proximity of a SSSI.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7779</th>
<th>Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A32</td>
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</table>

As set out in our previous consultation response, the National Trust objects to the proposal to remove the Law College / Mount Brown sites from the Green Belt to enable redevelopment. This site lies within the AONB / AGLV and within the St Catherine’s Conservation Area. This site is close to the River Wey and is highly visible heading downstream from Shalford to Guildford. The redevelopment of this site would have a potentially major impact on the amenity of the River Wey and the setting of the River Wey Conservation Area, the AONB, the St Catherine’s Conservation Area and the setting of the St Catherine’s Scheduled Ancient Monument. The site makes a significant contribution to the Green Belt and lying on the periphery of the urban area it is crucially important to ensure it remains essentially open in character. Its removal is therefore not in accordance with paragraph 85 of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7890</th>
<th>Respondent: 15460737 / Donna Collinson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
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</table>

Object to erosion of AONB or removal from Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/7132  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A32

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy A32 Surrey Police HQ Page 197

Under “Requirements,” an additional bullet should be included to read: “Close rear access to Sandy Lane for vehicular use.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7146  Respondent: 15629377 / The Woodland Trust (Jack Taylor)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A32

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A32</td>
<td>Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford</td>
<td>Guildford</td>
<td>C3, 116 Homes</td>
<td>Adjacent</td>
<td>Unnamed ASNW, SU990479 Piccard’s Rough ASNW, SU987480</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7742  Respondent: 15669057 / Police and Crime Commissioner for Surrey (Alison Bolton)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A32

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Introduction and Background
1.1. Tibbalds Planning and Urban Design is the appointed planning consultant acting on behalf of the Police and Crime Commissioner for Surrey. These representations relate to the June 2016 consultation of the Proposed Submission version of the Local Plan: Strategy and Sites document, which is open for consultation until Monday 18 July.

1.2. This supporting statement sets out the case for amending draft allocation A32 for the Surrey Police Headquarters. The site is allocated in the Proposed Submission Local Plan for approximately 116 homes and we consider there to be a strong case for increasing the allocation to approximately 200 homes by expanding the southern boundary of the site. The proposed new area for allocation is shown on plan ref. 5630/02.

1.3. These representations explain how the proposed increase in housing numbers is a sustainable option to deliver additional housing in the Borough that accords with national and local policy. The following documents have been submitted in support of these representations:

1. Plan ref. 5630/01 - Opportunity for Additional Residential Development (see appendix)
2. Plan ref. 5630/02 – Potential Additional Allocated Area (see appendix)
3. Ecological Walkover Survey – WYG
4. Highways and Access Technical Note – WYG
5. Landscape and Visual Impact Appraisal + supporting landscape plans – WYG

2. Green Belt

2.1. The Mount Browne site has historically been included within the Green Belt. Policy P2 of the June 2016 Proposed Submission Local Plan recognises that Green Belt boundaries are only to be modified in exceptional circumstances and through the Local Plan process. In light of the development pressures within Guildford the Council are proposing to inset some sites from the Green Belt. This policy identifies Mount Browne as a major previously developed site that is to be inset from the Green Belt:

Site A32 – Surrey Policy Headquarters, Mount Browne, Sandy Lane, Guildford

2.2. The site is allocated for approximately 116 homes and is required to ‘provide positive benefit in terms of landscape and townscape character and local distinctiveness and have regard to the identified landscape character areas’.

2.3. The draft local Plan proposes that the Green Belt boundary is partially redrawn around the Mount Browne site, but these representations recommend that this is extended to include the developable areas in the south, reflecting the logical boundaries of the site and directing development to areas that will have the least visual impact. This does not mean that development would or should include the entire allocation area, but would reflect logical site boundaries. This proposed change would retain existing areas of ancient woodland and other wooded areas that screen the site. This would provide the opportunity for additional homes and also allow for wider landscaping and open space provision and management across the site consistent with the principles of the current draft allocation. This approach is consistent with other allocations in the draft Local Plan.

2.4. Section 9 of the March 2012 National Planning Policy Framework sets out national policy for protecting Green Belt Land between paragraphs 79 and 92. The NPPF states that ‘the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence’ (para 79).

2.5. Paragraph 80 of the NPPF sets out the five purposes served by the Green Belt. We consider that the proposed extension of the Mount Brown Green Belt inset would be in accordance with all five points and would not cause any harm to the Green Belt. These points are developed further in the following sections of the representations, but in summary:

1. To check the unrestricted sprawl of large built-up areas

2.6. The Mount Browne site is located c.370m to the south of the designated Guildford Urban Area, as defined by the draft Proposed Submission Local Plan proposals map. Although not within the defined urban area, the site is not isolated and is close to the University of Law site (allocation A33), A3100 road and Artington park and ride. Allocating this site
for additional development would represent a natural and compact extension to urban area, reflecting the existing urban form.

2.7. It is important to consider this proposal in light of other draft land allocations in the Borough. There is a recognised shortage of developable land, requiring several large sites to be released from the Green Belt to deliver housing. Although this proposal represents a small extension to the Guildford urban area, it should be considered as an appropriate and sustainable option when compared to many of the other proposed Green Belt insets.

2. To prevent neighbouring towns merging into one another

2.8. The Mount Browne site is located c.370m to the south of the Guildford Urban Area and c.2.2km to the north of Farncombe. Extending allocation A32 an additional 200m to the south would have no discernible impact on the separation between the two settlements.

3. To assist in safeguarding the countryside from encroachment

2.9. Although located in the Green Belt, the site has been used for a variety of purposes that are not consistent with typical countryside uses. The area has historically been used for private recreational purposes, including a sports pavilion, a landscaped sports pitch and a car park. Parts of the southern area are therefore classed as previously developed land. Although the amenity space is not classed as previously developed land, it is also not open countryside. Extending the A32 allocation southward would not encroach into the countryside in light of the previous uses and strong site boundaries.

4. To preserve the setting and special character of historic towns

2.10. There are no towns of special character that would be impacted by this proposal. The St Catherine’s conservation area is located directly to the north of the A32 allocation.

5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

2.11. Part of the site is classified as previously developed land in accordance with the NPPF definition and the remainder has been heavily landscaped. Since this site is now redundant, allocating it for housing represents an appropriate alternative use.

2.12. These points are developed in more detail below.

2.13. The January 2013 Guildford Borough Green Belt and Countryside Study has been used to inform how land should be released from the Green Belt in the new Local Plan. Volume V explores major previously development sites and identifies Mount Browne Police Headquarters as one of eleven potential sites for release from the Green Belt.

2.14. The appraisal of the Mount Browne site contained within section 20 of Volume V recognises that the majority of the site is considered to exhibit a visually enclosed character with a limited contribution to the wider Green Belt. It was considered appropriate to recommend the Mount Browne site for insetting within the Green Belt due to it not presenting a visually open character and possessing defensible boundaries. This assessment sets out potential boundaries for insetting from the Green Belt.

2.15. Whilst we recognise that there is more previously developed land on the northern section of the site, the area to the south could be inset from the Green Belt with few negative impacts, consistent with the conclusions of the Green Belt and Countryside Study.

2.16. It is worth noting that one of the original purposes of creating the Green Belt was to provide access to public open space and recreation areas. It is clear that the Green Belt includes land of variable quality and we encourage the Council to consider how the land within the Green Belt is used and whether there is public benefit to its continued designation. The Local Plan acknowledges that there are significant development pressures within Guildford Borough and a lack of land for development. Since the Council recognises that there is a need for the careful release of Green Belt land to meet development pressures in the area, the most sustainable locations should be given priority over less sustainable sites in more rural areas.
2.17. The proposed submission Local Plan designates 14 villages to be inset from the Green Belt. We recognise that this approach is broadly in line with national guidance, which states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt.

2.18. Whilst we acknowledge that the insetting of villages is in accordance with national policy, there are a number of proposed allocations that would extend the Green Belt insetting significantly beyond what is considered to be the natural boundary of each settlement in accordance with the January 2013 Green Belt and Countryside Study. A review of the allocations set out in the Proposed Submission Local Plan indicates that 431 homes are allocated in inset villages and infill development within identified Green Belt villages. Whilst some of these allocations are appropriate and sustainable, others are large green field sites, formerly within the Green Belt, on the edge of small villages with limited previously developed land and poor access to community facilities. If these sites are considered to be suitable for allocation in light of national policy, then the proposed extension to allocation A32 should also be considered to be appropriate.

2.19. In addition to the inset villages, seven major previously developed sites are inset from the Green Belt, including Mount Browne. Sites identified as previously developed land in the Green Belt are scheduled to deliver 216 homes throughout the plan period according to the sites schedule on pages 123 – 126 of the Proposed Submission Local Plan.

2.20. We considered this proposed approach to be unsound on the grounds that it is not the most sustainable strategy. Paragraph 84 of the NPPF states that ‘when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary’. This policy clearly requires priority to be given to the most sustainable locations. The sustainability credentials of Mount Browne are explored in detail in the following section, but since there is a clear opportunity to deliver approximately 84 additional homes in a highly sustainable location on the edge of Guildford with excellent public transport and very limited visual impact, this should be prioritised over far more isolated sites in smaller settlements.

3. Sustainability

3.1. Delivering sustainable development is a driving principle of the NPPF. Paragraph 17 states that planning should ‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable’. In addition, paragraph 30 states that ‘encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport’. Overall we consider Mount Browne to represent a highly sustainable location that provides good access to non-car modes of public transport.

3.2. The June 2016 Sustainability Appraisal sets out the sustainability credentials for each of the proposed allocated sites. A traffic light approach is used to appraise individual sites. Site A32 is shown to be one of the more sustainable allocations in the Borough, with greenlights against 11 of the 21 criteria. Although access to shops and schools are considered to be relatively poor, the Mount Browne site is still considered to be more sustainable than many other allocated housing sites with worse sustainability credentials. The proximity of Guildford town centre coupled with good public transport links gives the Mount Browne site excellent access to the facilities provided there.

3.3. The May 2014 Settlement Hierarchy Document is identified as key evidence in the Proposed Submission Local Plan. This document divides the settlements in Guildford Borough into the following hierarchy in order to promote sustainable development:

1. Urban Area (Guildford)
2. Rural Service Centre x 1
3. Large Villages x 11
4. Medium Villages x 6
5. Small Villages x 6
6. Loose knit / hamlets x 13
3.4. This report confirms that the Guildford Urban area is by far the largest settlement in the Borough with the best access to jobs, education, public transport, health care facilities and shops. Locating additional residential development at the edge of the Guildford Urban Area, with excellent public transport links, therefore presents a very sustainable option.

3.5. The proposal for approximately 200 houses would result in a significant reduction in vehicle movements than that which currently exist. Section six of the attached transport technical note demonstrates that the site currently generates approximately 391 trips between 0700 – 0900 and 397 trips between 1600 – 1800, in addition to other vehicle movements throughout the day necessitated by the police headquarters operations.

3.6. The technical note demonstrates that even in a worst case scenario, the proposed development of 200 houses on the site would generate approximately 191 trips between 0700 – 0900 and 212 trips between 1600 – 1800. This demonstrates that developing the site for 200 units would generate significantly fewer two-way vehicle trips when compared to the current operation, providing a significant net benefit to the operation of the existing site access, local junctions and the local highway network.

3.7. NPPF paragraph 35 states that ‘developments should be located and designed where practical … to give priority to pedestrians and cycle movements, and have access to high quality public transport facilities’. Increasing the allocation on the Mount Browne site from 116 to 200 would help deliver a scheme that accords with these principles.

3.8. Extension of the site allocation boundary to include the southern area of the site will allow improved access to the Artington Park and Ride site and bus routes into Guildford town centre. The footway along The Ridges runs east to west linking to the A3100 footway which provides a connection to Artington Park and Ride. This is approximately a 700m walk from the edge of site A32.

3.9. Extending the allocation to the south will form a more natural connection between the sites by reducing the site edge to park and ride walking distance to approximately 450m. The Artington Park and Ride is served by the number 200, which provides 5 to 6 services per hour to Guildford Bus Station from Monday to Saturday, operating between 0730 and 1920. The Artington Park and Ride is also identified for improved bus services by the June 2016 Guildford Borough Transport Strategy (ASP7).

3.10. In addition to the Park and Ride, bus stops are located on the A3100, just north of the junction between The Ridge and the A3100. These bus stops are served by a number of services (42, 70, 71, 72, 506 and 523) which collectively provide on average 4 services per hour to Guildford bus station, from Monday to Saturday operating between 0645 and 2000, with a reduced service on Sunday.

3.11. Guildford Railway Station is located 2.1km from the proposed development site and can be reached within 25 minutes by walking, 18 minutes by walking to the A3100 bus stops and changing at the bus station or by 10 minutes by cycling.

3.12. Route 22 of the National Cycle Network is located to the north of the site, within a 5 minute cycle ride. Route 22 provides a signed route into the Guildford Cycle Network and wider area. Cyclists would access the route by using the local road network and considering that Guildford is within a 10 minute cycle ride, it is likely that use of this route to access Guildford would be a favourable option for regular commuters.

3.13. Overall we consider the Mount Browne site to be very well located to encourage non-car journeys and will reduce the number of trips generated to and from the site, even with an increase in allocation from 116 to 200 homes.

4. Housing

4.1. The proposed additional homes on the Mount Browne site could contribute to housing delivery for the Borough in the early years of the plan period, with new units on the extended area potentially coming forward before those within the footprint of the existing buildings and facilities on site.

4.2. The June 2016 proposed Submission Local Plan recognises that there is an objectively assessed need to deliver an average of 693 dwellings per annum in accordance with the findings of the September 2015 West Surrey Strategic Housing Market Assessment (SHMA). Policy S2 of the Proposed Submission Local Plan states that the Council’s
preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). The Guildford urban area is the most significant settlement in the Borough, identified as the most sustainable settlement in the Borough by the May 2014 Settlement Hierarchy Report. Guildford is the closest settlement to the Mount Browne site, the designated edge of which is approximately 370m to the north of the site. Development should therefore be prioritised in the Guildford Urban Area where possible since this is recognised as the most sustainable location.

4.3. Table 1 attached to Policy S2 demonstrates that land has been allocated to deliver 13,652 homes throughout the plan period. 2,742 (20%) of these are to be delivered in Guildford town centre and the Guildford urban area, with the remainder being delivered via an urban extension to Guildford and significant development in smaller settlements. Whilst we recognise that not all development can be located in Guildford, all opportunities should be taken to deliver housing in the most sustainable locations. This can take advantage of existing infrastructure, unlike the large strategic greenfield developments proposed elsewhere in the Borough that will require significant new infrastructure.

5. Area of Outstanding Natural Beauty and Landscape Impact

5.1. The Mount Browne site is located within the Surrey Hills AONB. Paragraph 115 of the NPPF states that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty’. Paragraph 116 states that planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. We consider the proposed changes to allocation A32 to have minimal impacts on the AONB as set out below.

5.2. Policy P1 of the Proposed Submission Local Plan sets out the following criteria for development in the AONB.

- conserve and/or enhance the setting and views of the AONB
- conserve wildlife, historic objects or natural phenomena within it
- promote its enjoyment by the community and visitors to the area
- support the rural economy of the Surrey Hills area
- provide or maintain public access to the AONB.

5.3. We have set out below how we consider that the proposed change to allocation A32 to accord with national and local policy.

5.4. Firstly, a significant proportion of the Mount Browne site is already allocated for development. The existing draft A32 allocation sits within the designated Surrey Hills AONB. Policy A32 states that provision must be made to provide positive benefit in terms of landscape and townscape character and local distinctiveness and have regard to the identified landscape character areas, recognising that it is possible to develop this site without having an undue impact on the AONB.

5.5. The attached Landscape and Visual Impact Appraisal prepared by WYG evaluates the site and surrounding landscape. The methodology used for this landscape and visual appraisal is based on the recommendations in Guidelines for Landscape and Visual Impact Assessment 3rd Edition published by The Landscape Institute and the Institute of Environmental Management & Assessment in 2013 (GLVIA3).

5.6. The report sets out the internal topography of the site, which varies considerably between the northern and southern parts of the site sloping down from approximately 100m AOD to 50m AOD in the south east corner. The northern area, where the current police facilities are located, is marked by a series of steep changes in level and is set on the edge of the ridge line running east-west. This is contrasted by the gradual change in level on the southern part of the site which slopes from 50m AOD at the eastern boundary up to approximately 65m AOD at the western site extents.

5.7. Existing vegetation is a key feature and defines the character of the site. Again there is a distinct change in vegetation between the northern and southern parts of the site. The northern area is densely vegetated with numerous tree groups, and often large individual tree specimens, together with an established shrub and hedge layer. Built form is set within this landscape context creating a sense of enclosure and separation.
5.8. Tree species are a mix of deciduous and evergreen species, including both native and ornamental specimens.

5.9. The southern part of the site contains a series of more open landscape spaces, relating to former uses associated with this part of the site. A former sports hall building effectively divides the site into two parts. To the east of this building is a flat area of grass formerly used for sports pitches, with an access road providing a link to The Ridges and the highway network beyond. Localised landform has been used to create this plateau for the pitches and the ground slopes down to the access road. The boundary is well vegetated with established hedge and trees.

5.10. To the west of sports hall is a further area of amenity grass with a number of large tree specimens with the land gently sloping up to the north and west. The southern boundary is more open with several gaps in the planting offering views into the site. Along the western boundary vegetation becomes denser enclosing the path link here.

5.11. The report also assesses the potential impact on the landscape in a 4km radius of the site. This detailed appraisal demonstrates that views from the north are limited by a combination of topography and vegetation. Views are available from the south, east and west, although the extent of these are limited and filtered by the extent of mature planting on site and in the wider landscape. Existing vegetation on the site and in the wider landscape reduces and filters views to the site, including close views.

5.12. Where there is potential for long distance views, these are often limited, with only the communications mast, located on the northern part of the site, visible above the tree line. This indicates that development on the southern section of the site, up to 50m AOD below the northern area of the site, would have no impact on the long distance views.

5.13. The report sets out potential mitigation measures for any development, including a comprehensive landscape strategy, strengthening existing boundary planting, particularly along the southern boundary; incorporating tree planting throughout the development layout; and management of the existing vegetation to ensure it continues to contribute to the character and qualities of the site.

5.14. The proposed allocation does not include the whole of the area within the ownership boundary. The area ancient woodland to the east would be retained and access to the public could be improved by any future development.

5.15. Overall there is a clear opportunity to increase the extent of the proposed development area on the Mount Browne site without impacting on the wider landscape. This is primarily due to the sloping topography of the site and existing vegetation which would be retained and enhanced as part of any development proposals. It is therefore concluded that impact on the AONB is limited and that development, combined with new access to areas of open space and recreation, as well as opportunities to provide new areas of landscaping, can bring about improvements to the setting of the AONB.

6. Ecology and Biodiversity

6.1. The Mount Browne site has been appraised for any flora or fauna of note by an ecological walkover survey conducted on 30 June 2016 by WYG. The survey has been submitted alongside these representations and sets out the findings in more detail. The survey was carried out broadly in line with the Joint Nature Conservancy Council Standard Phase 1 habitat survey technique and is intended to give an initial view on the ecological quality of the site. The timing of the survey was optimal for encountering species of note.

6.2. The survey found that the different areas of the site contain a variety of habitats which vary from high to low ecological value. The amenity grassland located in Area 1, has a low ecological value whereas the semi-natural broadleaved woodland has a high ecological value, as they have potential to support various notable species. It is therefore recommended that any additional housing (within an allocation extension) is planned to be located within the amenity grassland area and hard standing / man-made habitats within Area 1. This would result in the least adverse ecological impact.

6.3. Furthermore, it is recommended that scattered mature trees, woodland and hedgerow habitats are retained wherever possible. A natural buffer (such as grassland) extending from woodland edges, should be incorporated into the design of the development where possible.
6.4. No protected species were found, but if a development were to be brought forward protected species surveys for bats, reptile, great crested newt, dormouse, badger and possibly breeding birds may be required.

6.5. Overall this demonstrates that a scheme for 200 homes on the site could be carefully designed to avoid any significant ecological impacts, building on the existing sports pitch areas and maintaining the wooded areas.

7. Heritage

7.1. The site is not located within a conservation area and there are no listed buildings on site. The nearest listed building is the Grade II listed Braboeuf Manor on the University of Law site and the nearest conservation area is St Catherine’s. Allocation A32 sits directly to the south of the conservation area and approximately 100m to the south west of the Manor.

7.2. These representations propose to allocate additional land to the south of the A32 allocation, approximately 170m to the south of the conservation area and screened by several dense tree lines, existing buildings and a significant drop in ground levels. There will therefore be no negative impact on these heritage assets.

8. Summary and Conclusions

8.1. In conclusion, the Mount Browne site is located in a sustainable location with good access to public transport and the centre of Guildford. The southern part of the site is well positioned to be developed with minimal impacts on the landscape quality of the surrounding area. Although the southern part of the site is currently allocated as Green Belt, it is sequentially preferable to many other Green Belt sites that the draft Local Plan is proposing to allocate. The A32 allocation should therefore be extended to include the additional land to the south in light of the lack of developable land in the Borough.

8.2. We therefore propose that the following change is made to the local plan policy A32:

1. Amend to say ‘The site is allocated for approximately 116 200 homes (C3)’
2. Update area to 15.4 ha
3. Update plan on page 198 to reflect amended site boundaries

8.3. The Police and Crime Commissioner for Surrey is pleased to have the opportunity to respond to the draft Local Plan and request that they are informed of any future consolation events.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
1. 2016_07_18 - Guildford Local Plan.pdf (100 KB)
2. 5630 5.6 Mount Browne Representations FINAL 18.07.2016.pdf (8.9 MB)

Comment ID: PSLPS16/7817  
Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  
Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water
infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed development exceeds the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4839  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

<table>
<thead>
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<th>Water Response</th>
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<td>42342</td>
<td>A32 - Surrey Police Headquaters, Mount Browne, Sandy Lane, Guildford</td>
<td>The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in</td>
<td>The wastewater network capacity in this area may be unable able to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure are may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</td>
</tr>
</tbody>
</table>
the planning process to understand what infrastructure is required, where, when and how it will be delivered

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 11.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: A33 - The University of Law, Guildford
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPS16/8116  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A33

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A33: The University of Law

Object to erosion of AONB or removal from Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2863  Respondent: 8557985 / Artington Parish Council (Philip Gorton)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A33

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University of Law, also assessed as of "high sensitivity," merits similar consideration to the neighbouring Mount Browne site. The University of Law and Mount Browne are almost connected and should not be considered in isolation.

In the GBCS Volume V justification for in-setting discusses the whole University of Law site but then in-sets just the car park in the Local Plan. APC finds this incongruous.

In the Local Plan the site is potentially allocated for student accommodation to be located on the site of an existing car park. This car park currently provides an open vista from the footpath to the north which would be lost if development was above ground level.

To provide protection to the essentially open character the site must be protected by AONB and Green Belt planning guides. Its removal from the Green Belt would not accord with Paragraph 85 of the NPPF. There is no exceptional circumstance, justification or need for The University of Law car park to be in-set.

APC believes the case to in-set has not been made and, accordingly, objects to the proposal to in-set the University of Law car park from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3927  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A33

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The University of Law, Guildford – this site will provide some accommodation for students on-site and seems an appropriate development assuming it can blend well into its rural environs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7979</th>
<th>Respondent: 10550913 / Nathaniel Lichfield &amp; Partners (Tor Barrett)</th>
<th>Agent:</th>
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Background

The University is the UK’s longest established specialist provider of legal education and can trace its origins back to 1876. The University moved to Braboeuf Manor on the Old Portsmouth Road in 1964. The campus comprises teaching accommodation and the University’s main office functions. The site is currently in D1 Use Class.

The Guildford campus has expanded since 1964 to provide additional on-site teaching accommodation. Approximately 700 students are currently educated at the Guildford campus and the University intends to increase the number of undergraduate places in law courses as well as introduce new business degrees at both undergraduate and postgraduate level at the University over the coming years. Accordingly, it is anticipated that the number of undergraduate and international students at the University will increase over the coming years. Both cohorts expect universities to provide student accommodation.

At present all the University students live off-site. The University does not own its own accommodation but instead has an arrangement with a number of private landlords who are able to offer some accommodation i.e. rooms in a shared house. The quality, type, extent and location of accommodation available in Guildford does not adequately provide for the needs of the University and is severely hampering its ability to attract students and grow in the future. These issues are exacerbated by the high cost of living in Guildford and raising expectations of the standard of accommodation required by students across the UK. It is vitally important that the University students have access to quality accommodation on-campus in the future and therefore the University welcomes the site allocation for student accommodation in response to the submission to the Council’s Call for Sites in January 2015.

The inset of the site from the Green Belt in paragraph 4.3.13 is also strongly supported by the University. The insetting of the site is considered to provide much needed flexibility to greater assist the University in meeting the needs of its students in the future. This approach by the Council is considered to be a positive response to paragraph 27 of the National Planning Policy Framework (NPPF) which encourages local planning authorities to take a proactive, positive and collaborative approach to development that will widen the choice in education.

However, the current drafting of Policy A33 for the site allocation states that “building higher than two storeys are unlikely to be suitable” and the associated plan limits the site of development to the existing car park in the north east corner of the site. These requirements are considered to unreasonably restrict future development at the site and for these reasons the University cannot support the site allocation in its current form. This is further explained below.

Site Location

The site location map appended to the site allocation identifies the development as appropriate within the car park to the north west corner of the University Campus. This reflects the positioning of the most recent schemes for future student accommodation. Nevertheless, the scheme for student accommodation on site is still emerging. Accordingly, it is important that the site allocation is sufficiently flexible to allow potential changes to the scheme in future, including a slightly amended layout, if required. The proposals would be appropriately assessed as part of the planning application process in terms of ecological, visual and heritage impact. Consequently, it is considered that the site allocation map
should include the whole campus as subject to the site allocation, in line with that submitted as part of the Call for Sites Form submitted in January 2015.

**Building Height**

With respect to building height, the draft site allocation includes the following as one of its requirements:

“Significant regard to height of buildings (buildings higher than two storeys are unlikely to be acceptable)”.  

This is a significant concern for the University in terms of the viability of the scheme. It is considered that in order for the scheme to be viable a building of more than two storeys is required. Paragraph 173 of the National Planning Policy Framework (NPPF) identifies that careful attention should be paid to viability to ensure that plans are deliverable. Therefore sites should not be subject to such policy burdens that their ability to be developed viably is threatened. Given that the scheme is still emerging, it is considered that the site allocation should be flexible in its wording to ensure that a viable scheme can be established. Accordingly, it is considered that in this case the statement that “buildings higher than two storeys are unlikely to be acceptable” is unreasonably restrictive on future development and should be removed. Alternatively, it could make reference to the height of development being a sensitivity in planning policy terms, which would need to be tested as part of any planning application process.

Furthermore, the pre-application request submitted to the Council in March 2015 presented a scheme of 4 storeys which stepped up in response to the ground levels of the site. The pre-application advice (ref. 15/A/00333) stated that “the Council is unlikely object to the scale or height of the building where this does not give rise to harm such as harm to the AONB or harm to the Conservation Area.” Should it be decided to proceed with a development on the site, any harm associated with the building height will be fully assessed as part of the planning application process. The restriction to a height of two storeys in the site allocation is therefore considered to be excessive and unnecessary.

**Conclusion**

Para 4.2.18 of the Proposed Submission Local Plan states that to minimise pressure on the existing housing stock it is important that any significant increase in full time student number is matched by the provision of purpose built student accommodation. The University has continued plans for expansion including the increase of undergraduate and postgraduate students requiring on site accommodation and consequently intends to deliver on site student accommodation.

The University therefore welcomes the inset of the site from the Green Belt to better meet the needs of its students in the future. In addition the allocation of the site for student accommodation is strongly supported. However it is considered that the building height requirement and site location map are unduly restrictive on future development schemes, particularly in terms of viability. A scheme for student accommodation at the site is still emerging and accordingly it is considered that the site allocation should be sufficiently flexible to allow an appropriate and viable scheme to come forward. The location and building height would be rigorously assessed as part of any planning application to ensure acceptability in terms of the impact on the Green Belt, Area of Outstanding Natural Beauty and Conservation Area for example. Accordingly, these restrictions in the policy itself are unnecessary.

We trust that the above comments will be taken into account by the Council during the preparation of the Local Plan for submission to the Planning Inspectorate for examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [13544 GBC (Local Plan Reps) 18-7-2016.pdf](#) (105 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites – Representations on behalf of the University of Law

On behalf of our client, the University of Law (the University), we enclose representations to Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites consultation which has been issued for public consultation until 24 July 2017.

Background

The University is the UK’s longest established specialist provider of legal education and can trace its origins back to 1876. The University moved to Braboeuf Manor on the Old Portsmouth Road in 1964. The campus comprises teaching accommodation and the University’s main office functions. The site is currently in Use Class D1.

The Guildford campus has expanded since 1964 to provide additional on-site teaching accommodation. Approximately 700 students are currently educated at the Guildford campus and the University intends to increase the number of undergraduate places in law courses as well as introduce new degrees including business at both undergraduate and postgraduate level and law with criminology over the coming years. Accordingly, it is anticipated that the number of undergraduate and international students at the University will increase over the coming years. Both cohorts expect universities to provide student accommodation.

At present all the University students live off-site. The University does not own its own accommodation but instead has an arrangement with a number of private landlords who are able to offer some accommodation i.e. rooms in a shared house. The quality, type, extent and location of accommodation available in Guildford does not adequately provide for the needs of the University and is severely hampering its ability to attract students and grow in the future. These issues are exacerbated by the high cost of living in Guildford and raising expectations of the standard of accommodation required by students across the UK. It is vitally important that the University students have access to quality accommodation on-campus in the future and therefore the University welcomes the site allocation for student accommodation in response to the submission to the Council’s Call for Sites in January 2015 (Annex 2).

Representations were submitted on behalf of the University to the Proposed Submission Local Plan in July 2016 which welcomed the proposed site allocation on its campus (Policy A33) and inset part of the site from the Green Belt; but raised concerns regarding the height constraints placed on the site allocation essentially limiting development to two storeys. We therefore welcome the revision of the site allocation wording to address these concerns and require future development to have “significant regard to height of buildings with specific regard to the setting of the Grade II listed Braboeuf Manor.” It is considered that this will provide the University with the flexibility to deliver a viable student accommodation scheme whilst ensuring it is appropriate within this sensitive site context.

However, we have further comments on the student numbers specified in the policy wording and site location. We expand on this below.

Student Numbers

By way of background, West Surrey Strategic Housing Market Assessment (2015) identifies that the number of students in the borough increased by 4,116 students between 2001 and 2011, of which 3,710 were full time students (excluding 16-17 year olds) equating to a 53% increase. Of this growth 1,329 students (32%) chose to live in halls of residents or other communal establishments, whereas 2,274 lived in the wider housing market area (55%). Students are therefore placing additional pressure on the housing market contributing to acute demand in housing and associated high rental costs for private rented accommodation. This is further exacerbated by the undersupply of housing recognised in the SHMA between 2001 and 2015 relative to the planned need of 419 dwellings per annum.

The provision of on-site student accommodation for the University would therefore contribute to alleviating this pressure on the housing market. Indeed, para. 4.2.18 of the Proposed Submission Local Plan states that “to minimise the pressure
on the existing housing stock it is important that new accommodation is provided to meet any significant increase in full time Guildford-based students.”

Since the Proposed Submission Local Plan consultation, the wording of Policy A33 in relation to the University of Law site has been amended to specifically allocate the site for 112 student bedspaces. We understand that this number has been established based on the Council’s assumption on a reasonable level of development within the Area of Outstanding Natural Beauty (AONB), rather than an assessment of need. It does not appear to have been based upon a detailed assessment of what the site might be able to accommodate in design terms.

Nearly all undergraduate law course providers make accommodation available for first years and most have accommodation for international post-graduate students. In order for it to compete, the University must offer a similar provision. The University is anticipating a considerable expansion of student numbers over the coming years through the introduction of new courses. Based on current projections the total number of students at the campus is anticipated to rise from 713 to 948 students by 2021 (see Annex 1), equating to a 33% increase in student numbers which would contribute to increased pressure on the local housing market. Of this, 108 will be undergraduate and international students who will expect on-site student accommodation (see Table 1). However this does not take account of the introduction of the new undergraduate business degree which the University expects to commence in the coming years. Based on the University’s student number predictions for this course, by 2021 there would be a bed space need of approximately 159 bedspaces to accommodate the first year business undergraduates. The allowance for a higher number of bedspaces is therefore necessary to support the expansion and growth of the University, particularly with regards to the introduction of the new undergraduate business degrees.

<table>
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<td>(full time)</td>
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<td>Total Requirement</td>
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The proposed policy should be flexibly prepared to enable detailed site capacity to establish the level of development the site can accommodate in design terms for discussion with the Council at the planning application stage. This approach would be consistent with NPPF para. 14 which encourages local planning authorities to positively seek opportunities to meet the development needs of their area. Indeed, draft Policy H1(5) states that “purpose built student accommodation for full time higher education Guildford based students will be encouraged on campus locations where appropriate” (our emphasis added). It is considered that this will provide the Council with sufficient control over the quantum of development on the site with the onus on the applicant to demonstrate that any level of student accommodation proposed in a subsequent planning application is acceptable from a design perspective, particularly in terms of the impact on the AONB.

Furthermore, the University is concerned that limiting the number of bedspaces to 112 could have implications on the viability of future student accommodation schemes. Paragraph 173 of the NPPF identifies that careful attention should be paid to viability to ensure that plans are deliverable. Therefore sites should not be subject to such policy burdens that their ability to be developed viably is threatened. Given that the scheme is still emerging, it is considered that the site allocation should be flexible in its wording to ensure that a viable scheme can be established. The specification of 112 bedspaces in the allocation could be unreasonably restrictive on future development schemes and should be removed to allow and appropriate and justifiable level of accommodation to come forward that will meet future need.

Consequently, it is not considered necessary to identify a specific number of bedspaces within the site allocation itself. Accordingly, we suggest that the policy wording is returned to its previous iteration to state: “The site is allocated for student accommodation (sui generis).”
Site Location

The site location map appended to the site allocation identifies the development as appropriate within the car park to the north west corner of the University Campus. This reflects the positioning of the most recent schemes for future student accommodation. Nevertheless, the scheme for student accommodation on site is still emerging. Accordingly, it is important that the site allocation is sufficiently flexible to allow potential changes to the scheme in future, including a slightly amended layout, if required. The proposals would be appropriately assessed as part of the planning application process in terms of ecological, visual and heritage impact. Consequently, it is considered that the site allocation map should include the whole campus as subject to the site allocation, in line with that submitted as part of the Call for Sites Form submitted in January 2015 (appended to this submission for reference).

Conclusion

The University has continued plans for expansion including the increase of undergraduate and postgraduate students and the provision of on-site accommodation is vitally important to support this. Whilst the site allocation for student accommodation is strongly supported, the specification of 112 bedspaces raises considerable concern. Para. 4.2.18 identifies that new accommodation should be provided to meet significant increases in student numbers and it is considered that the site allocation in its current form will not enable the University to deliver this. Draft Policy H1(5) provides the Council with sufficient control on the quantum of the development through the planning application process to ensure acceptability. Similarly, the location of development would also be rigorously assessed as part of the planning application. Accordingly the proposed restrictions in the policy itself are unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [13544_GBC_Local_Plan_Consultation__Reps_on_behalf_of_ULaw_2472017.pdf](13544_GBC_Local_Plan_Consultation__Reps_on_behalf_of_ULaw_2472017.pdf) (351 KB)

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**Comment ID:** PSLPS16/7891  **Respondent:** 15460737 / Donna Collinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A33

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object to erosion of AONB or removal from 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:** PSLPS16/7147  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A33

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A33</td>
<td>The University of Law, Guildford</td>
<td>Guildford</td>
<td>Student Accommodation</td>
<td>Adjacent</td>
<td>Unnamed ASNW, SU989482</td>
</tr>
</tbody>
</table>
Policy A32: Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford
Policy A33: The University of Law, Guildford

These sites are within the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

These sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated.

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: A34 - Broadford Business Park, Shalford
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPS16/10 Respondent: 8582177 / John Green Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to confirm my support for the GBC plan for the redevelopment from this site, the current modern offices are extremely obtrusive on the local landscape, especially from the River and the former Wharf area. Ideally any domestic housing will try and reflect the history of this area. It will lead to the greater use local public houses/shops & restaurants.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2398 Respondent: 8598785 / Mr Roger Parslow Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of Brownfield site (A34) from the Plan

- Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8269 Respondent: 8627201 / Shalford Parish Council (Nuala Livesey) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy A34 Broadford Business Park – 100 homes

We are concerned about the development of this site for the following reasons;

3.1.1 As compared to the existing traffic volumes from the Business Park users it would seem that 100 homes would create a major increase in traffic movements from Broadford Park with a consequent knock-on effect to the T-junction of that road where it meets the A281 (already noted above for its severe congestion problems – see 2.1 above). It should also be noted that the exit/entrance to the site is very close to a blind bend on the Broadford Road.

3.1.2 As a residential site there is inadequate pedestrian access from the site to the school, railway station, bus stop and shops. There is no safe walking route from Broadford Road along the A281, because there is no pavement on the west side of that road and it is not permitted to construct one on Common land. There are paths over the Common but not of...
an all-weather nature, although the main path across the Common via Juniper Terrace has been newly relaid. If some of these issues could be resolved we would suggest that the site could possibly support a smaller development of mixed flats and small houses, or even sheltered housing to cater for the elderly and so help to release larger properties for younger families.

3.1.3 The risk of flooding is a concern as parts of the site are identified as Zone 2 and 3 flood zones. We wish to emphasise our concern that any affordable housing provided here should be at no greater risk of flooding than any market property located on the site.

3.1.4 The River Wey is a significant part of the Parish’s “blue infrastructure” and as such would need sensitive development of the site with appropriate screening and due regard for National Trust guidelines. This stretch of water is popular with users of narrow boats and is therefore a valuable tourist attraction for the whole borough. In consequence, it is particularly important that any development of this site does not have an adverse impact on the peace and tranquillity of the water meadows on the opposite bank.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2426  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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 Brown field site A34 and A44 from the plan – whilst the plan claims to have adopted a ‘brownfield first approach,’ this is clearly not the case and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2493  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3029  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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: pslp172/2173</th>
<th>Respondent: 8879937 / Dietlinde Brown</th>
<th>Agent:</th>
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<th>Comment ID: pslp172/1923</th>
<th>Respondent: 8907425 / Julia Wood</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: pslp172/4254</th>
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<th>Agent:</th>
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### Policy A33 – Broadford Business Park

1. **I object:** to 100 homes being removed from the plan as there is a ‘Park and Ride’ nearby, therefore a sustainable site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: pslp172/1027  Respondent: 9009153 / Lindsay Mitchell  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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: pslp172/1784  Respondent: 9241793 / Nicky Wilson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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: pslp172/1163</th>
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<th>Agent:</th>
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<tr>
<td>The Plan contains inconsistencies in respect of traveller sites.</td>
<td>A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...&quot; Clearly A50 more than covers the total assessed “need” of 8 places, (page 40, 4.2.22.) and so no “need” exists for this in site A34. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.</td>
<td></td>
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<tr>
<th>Comment ID: pslp172/1672</th>
<th>Respondent: 10701537 / Ben Gamble</th>
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<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:** pslp172/1107  **Respondent:** 10731937 / Carol Mullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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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:** pslp172/1708  **Respondent:** 10818529 / John Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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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:** pslp172/3157  **Respondent:** 10828737 / Claire Dawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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: pslp172/2985</th>
<th>Respondent: 10828897 / Christopher Merrick</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: pslp172/1002</th>
<th>Respondent: 10836033 / Katherine Gervasio</th>
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</table>

I object to the fact that Brownfield sites A4 and A34 have been removed from the Local Plan which puts pressure onto Green Belt sites to meet the so-called housing “need”. Surely it would be better to build on Brownfield sites rather than Green Belt?!!

I wish these objections to be fully taken into consideration, forwarded to the Planning Inspectorate and the Plan amended accordingly.

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2444</th>
<th>Respondent: 10910753 / Heather Thompson</th>
<th>Agent:</th>
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<th>Respondent: 10994817 / Alan Hill</th>
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<td>POLICY A34: Broadford Business Park I object because this area is at high risk of flooding.</td>
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</table>
OBJECTION TO THE REMOVAL OF BROWNFIELD SITES, A4, GUILDFORD TOWN CENTRE AND A34, BROADFIELD BUSINESS PARK, SHALFORD.

I OBJECT to the removal of these site from the Local Plan. The Council claims to adopt a brownfield first policy. Policy A4, the former Guildford telephone exchange, is now proposed to be used for commercial retail rather than as before, housing. This clearly suggests the Council is failing to properly implement government policy to use brownfield sites first, before going for previously undeveloped land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: pslp172/4312</th>
<th>Respondent: 11166497 / CALA Homes (Southern Home Counties)</th>
<th>Agent: Vail Williams LLP (Jane Terry)</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A34</td>
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Site Allocations:
Land at Treetops Boarding Kennels and Loxhill Nursery, Old Portsmouth Road should be added to the list of sites in the Previously Developed Land in the Green Belt category of Site Allocations as follows:

New Site A34 Treetops Boarding Kennels and Loxhill Nursery Shalford Homes (C3) 39

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: PSLPS16/7776</th>
<th>Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)</th>
<th>Agent:</th>
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This site also abuts the River Wey and Godalming Navigations Conservation Area yet no reference to the consideration of the Conservation Area is made in the policy which is again very disappointing. This part of the Navigations passes through medieval hay meadows, meads and flood plain. It is characterised by its openness and is therefore highly susceptible to a change in character resulting from the redevelopment of this site.

The Trust will seek the preservation and enhancement of important views out of and into Navigations, as well as the preservation and enhancement of the strong sense of openness, natural landscape character and waterway atmosphere at this point along the Navigations.

The draft policy should be updated to address the following considerations:

- The height and scale of new buildings on this site must have regard to the visual setting of the Navigations;
- New buildings must be well set-back from the Navigations, unless historical precedent dictates otherwise;
- New parking and loading areas must not be located adjacent to the Navigations;
• The planting screen between any new development and the Navigations must be strengthened and managed for the long term;
• New building materials and colours must be visually compatible with the rural character of the Navigations;
• New elevations facing the Navigations must be well-articulated, varied in design and respect the site’s historical associations with the Navigations;
• Lighting must not overspill into the waterway environment;
• The existing footpath alongside the Navigations must be retained and surfacing improved to provide improved access for all along the river frontage;
• New development must not result in an increased risk of flooding or an adverse impact on the water table or destabilise the banks of the Navigations.

We wish to continue to be consulted on planning applications on these sites and any others affecting the River Wey.

In respect of All Sites along the Navigations the National Trust will continue to seek to ensure there is:

• a consistency and cohesive design of riverside landscaping, including materials, signage, street furniture and fencing;
• detailed consideration of appropriate materials and surface treatment of the public realm, particularly the towpath, reflecting the historic character of that part of the Navigations to avoid over urbanisation;
• well maintained and visually attractive boundary structures;
• the removal/avoidance of any visual intrusion into the Navigations from car parking and loading areas;
• no building of structures, whether temporary or permanent, which could de-stabilise the banks of the Navigations;
• appropriate lighting which does not overspill into the waterway environment urbanising the character of the area;
• Opportunities for protection and enhancement of nature conservation along the riverside.

As set out at the start of this letter, we have again appended a copy of the Trust’s ‘Principles for development affecting the River Wey Corridor in Guildford Town Centre’ which we would urge the Council to formally endorse in Local Plan policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2362  Respondent: 15064673 / Steven Yadav  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2359  Respondent: 15081505 / Victoria Yadav  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A34
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<th>Comment ID: pslp172/2309</th>
<th>Respondent: 15114721 / Leslie Macnair</th>
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<th>Comment ID: pslp172/1014</th>
<th>Respondent: 15136513 / Ian Mitchell</th>
<th>Agent:</th>
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<th>Comment ID: pslp172/1374</th>
<th>Respondent: 15248481 / Jamie McCallister</th>
<th>Agent:</th>
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Attached documents:

Comment ID: pslp172/1246  Respondent: 15406145 / Paul Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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Comment ID: pslp172/2275  Respondent: 15432705 / Gordon Bennett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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Attached documents:

Comment ID: pslp172/1560  Respondent: 15434433 / James Collins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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Comment ID: pslp172/3103  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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Attached documents:

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Comment ID: pslp172/1825  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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Attached documents:

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Comment ID: pslp172/2193  Respondent: 15585793 / Mark Horigan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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Attached documents:

Comment ID: pslp172/3258  Respondent: 15591585 / John Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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Attached documents:

Comment ID: PSLPS16/7818  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 116 dwellings exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
INTRODUCTION AND OVERVIEW

These representations have been prepared by Barton Willmore LLP on behalf of Zurich Assurance Limited and their fund managers Columbia Threadneedle (hereafter referred to as ‘Zurich’) in respect of their landholding at Broadford Business Park, Broadford Park, Shalford GU4 8ED, which lies to the south of Guildford.

These representations are submitted in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (‘the Proposed Submission GBLP’), which Guildford Borough Council (GBC) has published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (‘the Local Planning Regulations’) for a 6 week period on the 6 June 2016.

Zurich previously submitted representations responding to the Draft Local Plan: Strategy and Sites (‘the Draft GBLP’) consultation under Regulation 18 of the Local Planning Regulations that was carried out between July and September 2014. The Draft GBLP outlined the draft strategic policies for the borough and proposed allocation of sites for various types of development, including residential, so to realise GBC’s vision, aims and spatial strategy.

GBC’s Local Development Scheme (LDS), approved at the meeting of the Council’s Executive on 29 September 2015, explains that following the completion of the current consultation, the Proposed Submission GBLP is to be submitted to the Secretary of State (SoS) for independent examination in December 2016. An Examination in Public (EiP) is proposed for April 2017. Subject to the Examiner’s findings, GBC anticipate it will adopt the new GBLP as the Development Plan for Guildford Borough in December 2017, at which stage it will replace the saved policies of the current adopted Local Plan (2003).

Overview

The Strategic Vision for Guildford Borough, outlined in Section 3 of the Proposed Submission GBLP, describes GBC’s plan for sustainable growth of the borough up to 2033. The vision identifies four key core themes, namely society, environment, economy and infrastructure, which will be used to inform the delivery of GBC’s strategic objectives.

Due to a number of factors, there is insufficient land available within the Borough’s existing urban areas and village settlements to accommodate the objectively assessed needs of the area. As recognised by GBC within the Proposed Submission GBLP, “exceptional circumstances” justify the allocation of land currently within the Green Belt to Broadford Business Park, Shalford

Broadford Business Park, Shalford

Broadford Business Park (hereafter referred to as ‘the Site’), which these representations focus upon, is previously developed land (PDL) and occupied by a number of buildings currently used as offices (Class B1(a)) and for light industrial (Class B1(c)) purposes. A more detailed description of the Site is set out at Section 2 of these representations.

The Site was first identified as a prospective development site in the Guildford Borough Land Availability Assessment (LAA) (current version dated February 2016) (LAA ref: 2186). Subsequently, the Site was allocated for redevelopment as part of the Draft GBLP (ref: Site 81). The site allocation has been retained as part of the Proposed Submission GBLP (ref: Policy A34) and has been assessed as being capable of delivering 100 new homes in place of the existing employment uses.

Zurich supports the proposed site allocation, as set out in the Proposed Submission GBLP, for a residential development. The Site can make a meaningful contribution to the housing requirements of Shalford and the wider spatial and development aspirations for the borough.
The indicative masterplan proposals and technical documents that accompany these representations demonstrate that the following can be delivered during the plan period:

- The delivery of up to 100 new homes (including affordable housing), to reflect GBC’s preferred tenure mix;
- Design-led approach that enhances the setting of the adjacent conservation area;
- High quality hard and soft landscaping to enhance the setting of the nearby Area of Great Landscape Value;
- Improved flood attenuation and mitigation measures to reduce flood risk and surface water runoff rates; and
- The opportunity to secure financial contributions through the planning application process and New Homes Bonus to enhance local services and infrastructure.

To demonstrate the deliverability of the Site, these representations are accompanied by the technical documents listed below. The corresponding document reference number has been included for ease of reference:

- BBP2: Design Statement, including Illustrative Masterplan prepared by John Thompson and Partners;
- BBP3: Commercial Agents Report prepared by Savills;
- BBP4: Flood Risk Advice Letter prepared by WSP;
- BBP5: Landscape and Visual Commentary prepared by Scarp Landscape; and
- BBP6: Transport Note prepared by TTP.

### Overarching Policy Context

The representations will have regard to paragraph 14 of the NPPF, which states that at the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  1. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  2. Specific policies in this Framework indicate development should be restricted.

Zurich’s representations seek to support GBC in ensuring that the Proposed Submission GB LP meets national planning policy and guidance within the context of the tests of soundness identified at paragraph 182 of the NPPF and the guidance contained in Planning Practice Guidance (PPG) relevant to the preparation of Local Plan (ref ID: 12). Paragraph 182 of the NPPF explains that the Local Plan will be examined by an independent Inspector, whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Whilst having regard to the overall objectives of the Proposed Submission GB LP, particular attention will be given to demonstrate that the Site is free from constraint and meets the availability, suitability and deliverability tests referred to in paragraph 47 of the NPPF. Zurich’s representations include technical assessments addressing the key policy considerations and demonstrating how the Site could be brought forward through an indicative masterplan and accompanying Design Statement that has been prepared by JTP architects.

General analysis of the policies particularly relevant to Zurich’s interests at the Site is provided. Where Zurich are proposing changes to Policy, these are highlighted in bold whilst all proposed deletions are struck through.
SITE DESCRIPTION

Broadford Business Park is situated to the south-west of the village, and identified settlement, of Shalford. The 1.5 hectare site is within the single freehold ownership of Zurich. An aerial photograph of the Site is included in Figure 1 below.

This previously developed site falls within the Metropolitan Green Belt and forms part of the locally designated Area of Great Landscape Value (AGLV) and Corridor of the River Wey (see Figure 2 below). Notably, the Site is located within 5 – 7km of the Thames Basin Heath Special Protection Area (SPA), which is beyond the zone of influence on the SPA as determined by Natural England. The LAA 2016 advises that development at the Site may have an impact on the SPA, judged on a case by case basis, and in that respect GBC’s draft Infrastructure Delivery Plan (IDP) (June 2016) confirms that a contribution may be required to the Chantry Woods and Tyting Farm SANGs.

The Site is occupied by seven commercial buildings (extending to circa 6,500 sqm) that range from two to three storeys in height, namely:

• Bishopsgate House;
• Broadford House and Park House;
• Northfield House and Southfield House;
• River House; and
• Captia House.

Two single storey outbuildings are located towards the northern site boundary. The buildings on the Site benefit from office (Class B1(a)) and light industrial (Class B1(c)) uses. The remainder of the Site is covered by block paving used for car parking that are interspersed with small areas of soft landscaping and trees. The existing trees along the eastern boundary adjacent to the River Wey provide some screening to the open countryside beyond.

As can be seen from Figure 3 below, the northern part of the Site falls within Flood Zone 2 as defined by the Environment Agency, whilst the western extremity of the Site is within Flood Zone 3. The remainder of the Site is within Flood Zone 1.

The Site is accessed by Broadford Park, which crosses common land owned by GBC, and joins with the A248 (Broadford Road) that links the villages of Shalford and Peasmarsh.

Immediately to the west of the Site is the River Wey, which is designated as the Wey and Godalming Navigations Conservation Area. Beyond the river navigation is an open flood plain that is also part of the AGLV as well as is a Site of Special Scientific Interest (SSSI).

To the east is an area of common land, which comprises areas of open grassland and woodland. This area is a designated as a Site of Nature Conservation Importance (SNCl).

Planning History

The Site has limited planning history and has not been subject to any previous planning applications for redevelopment that might be relevant to informing the proposals going forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  BBP-1 Reg 19 Reps.pdf (1.1 MB)

Comment ID: PSLPS16/7987  Respondent: 15693153 / Zurich Assurance Ltd  Agent: Barton Willmore LLP (Sinéad Morrissey)
The Proposed Submission GBLP is accompanied by a comprehensive set of ‘Site Policies’ that are designed to allocate land for a range of uses to support the vision, aims and objectives of the Local Plan. These policies consider sites within the whole of the borough, and allocate land for development including for housing, employment, retail and infrastructure.

Each policy lists uses that are acceptable on the identified land, alongside specific requirements and opportunities for future development proposals. Allocated sites are encouraged to progress development proposals as soon as possible, to help provide housing in the earlier stages of the plan period, to help boost housing supply. Equally, where allocated sites have been identified as likely to deliver in the later years of the plan period due to constraints, if these are resolved sooner, development proposals are encouraged.

The proposed site allocation for Broadford Business Park is set out at Policy A34 of the Proposed Submission GBLP. The Site Policy specifies the allocation, requirements and opportunities set out in Table 3 below that are to be taken into account as part of future proposals for the Site.

The supporting text that accompanies the Site Policy goes on to identify the ‘Key Considerations’ relevant to proposals for the Site. These give due consideration to the relevant planning policy designations that are summarised in Section 2 of these representations.

Zurich wholly supports GBC’s decision to allocate their land at Broadford Business Park for residential development. Zurich is committed to ensuring the optimal amount of new homes are delivered on the Site as early as possible within the plan period.

As explained in Section 2 of these representations, the Site is wholly within the single freehold ownership of Zurich. The majority of the Site will be available for redevelopment by 2019 through vacant procession, with Bishopsgate House later in the plan period. The Site is therefore available for development in the short to medium term and can provide a meaningful contribution to the borough’s housing needs in the short term.

Site Allocation Boundary

Zurich have noted that the access road (Broadford Park) that links the Site to the public highway (A248 – Broadford Road) has not been included in the proposed site allocation. Broadford Park is tarmacked private road that crosses common land owned by GBC (see Figure 6 below).

Zurich have a well-established easement agreement with GBC that provides a right of access over this land for users of the Site. It is anticipated that Broadford Park will continue to serve as the principle vehicular access to the Site. However, vehicular access would be possible from the north-west corner of the Site directly onto Broadford Road, if required. As such, Zurich considers this should be reflected in the Site Policy for the Site. Zurich therefore requests that GBC amend the site allocation boundary so to include Broadford Park and, for the sake of clarity, specify within Policy A34 that the land is only to be used to provide vehicular access to the Site. Furthermore, please note the change in site boundary at the corner adjacent to Broadford Cottages to reflect ownership. Further Figure 7 illustrates the suggested revised site allocation boundary.

Land Availability Assessment

In weighing up the decision whether to allocate the Site under Policy A34, GBC have had regard to the analysis contained in the LAA. Whilst the LAA is not an expression of planning policy and does not grant planning permission for new development, it does provide an evidential baseline that highlights prospective constraints and indicative capacity of any given site.

Consistent with the deliverability tests described at footnote 112 to paragraph 47 of the NPPF, LAA site reference 2186 considers the suitability, availability and achievability of new development on the Site.
In response to the analysis provided by site reference 2186, these representations are supported by a comprehensive suite of technical documents, prepared by an expert consultant team, to demonstrate that the Site is free from constraint and meets deliverability tests referred to in paragraph 47 of the NPPF. Through the detailed work undertaken, it has been possible to demonstrate that the Site is sustainable and can be well integrated into an existing and enhanced infrastructure network.

Set out below is a summary of the indicative development proposals for the Site along with the key findings of the technical documents prepared in response to the analysis contained in the LAA.

Development Proposals

A Design Statement with concept masterplan (Doc Ref: BBP-2) has been prepared by JTP architects to illustrate Zurich’s proposal for its allocation. The proposals would deliver up to 100 new homes in a range of sizes and tenures that will be tailored to meet local housing needs.

Based on a detailed analysis of the Site’s Constraints and Opportunities, page 8 of the statement presents an illustrative vision of how the Site could be developed. Development is envisaged as a range of short terraced homes, some detached and semi-detached dwellings and clusters of apartments. A prospective site layout has been prepared that offer an indication on how the Site could come forward for development. The housing mix, as summarised in Table 4 below, has been adjusted to achieve an appropriate balance between meeting local housing needs, as described in GBC’s SHMA, whilst maintaining the character and appearance of the area. Ultimately, the final housing mix for the Site would be determined at the planning application stage in response to housing needs at that time.

The site area of the proposed site allocation is 1.5 hectares. This results in an overall development density of 66 dwellings per hectare (dph).

The layout provides a high degree of pedestrian permeability between the proposed development and the existing community, as well as making better use of the existing green and blue infrastructure, particularly in terms of improving access to the River Wey and maintaining a respectful relationship with the open countryside to the west. New landscaping across the Site will also increase opportunities to improve the biodiversity value of the Site and integrate more effectively with the SNCl and SSSI areas to the east and west.

Consistent with the objectives of Policy H2 of the Proposed Submission GBLP, the proposals for the Site will ensure affordable homes are delivered in line with GBC’s policies. Further discussions will be conducted with GBC’s Housing Team to finalise the particulars of the affordable housing products and that the proposed is reflective of local housing needs.

The Site is within easy reach of a wide range of areas of public open space, including the River Wey Navigation and Shalford village green. Opportunities to provide contributions to enhance these areas of open space will be secured as part of redevelopment of the Site. A landscape buffer will be provided along the western site boundary for the benefit of future residents so to improve access to the River Wey and provide flood risk mitigation.

Technical Evidence to Support Allocation

As set out in Section 1 of these representations, a suite of technical assessments have been undertaken to address the key planning considerations relevant to the Site. Whilst additional technical studies will be required for any planning application to redevelop the Site, the following address the key issues relevant to the plan making process.

Commercial Agents Report (BBP-3)

A commercial agents report (and associated financial appraisals) has been prepared by Savills to support these representations. The report considers the following:

- Whether the existing buildings are suitable for refurbishment or whether they have reached the end of their economic life.
- Whether redevelopment of the site for employment use is economically viable.
• Whether there is a need for this current space within the Borough for employment purposes or whether there are better suited locations.

The report advises that the existing buildings are failing and the considerable cost of their refurbishment is not a viable option for a developer. It also confirms that alternate employment uses on the site as part of a redevelopment proposal would also be unviable and, in any event, the site is not best placed for such a use in terms of location or demand. Its concluding remark is: “refurbishment of the existing office stock or the redevelopment of the site with a new office scheme will not offer a viable proposition for developers or investors. If the Property were to be brought to the market in its current form we are of the opinion that demand will be from residential developers.”

Flood Risk Advice Letter (BBP-4)

A Flood Risk Advice letter has been prepared by WSP to accompany these representations. It provides a brief assessment of the baseline assessment of flood risk, climate change and drainage and concludes as follows:

“In summary, the site is located in Flood Zone 1, 2 and 3, but mainly Flood Zone 2 Residential development should be preferentially located in Flood Zone 1, followed by Flood Zones 2 and 3, as discussed in Sequential and Exception Tests. To allow for climate change, a basic assessment assumes the 1 in 100 plus climate change level to be 34.80m AOD. It is recommended that further discussions with the Environment Agency are undertaken to agree an approach for estimating the climate change level.

As shown by the GBC SFRA’s the site is sequentially appropriate for development as although there are preferential site outside the flood plain the required allocation for development cannot be met in these areas and that - ‘The LAA and sequential test identifies that there is no reasonably available site appropriate for the proposed development of 100 homes with a lower probability of flooding.’

Based on the current information available and the above assessment, and on the understanding that residential development is located above a level 34.80m AOD including suitable mitigation and management measures are utilised it is concluded that the proposed development is considered appropriate from the perspectives of flood risk.”

Transport Note (BBP-5)

A Transport Note prepared by TTP accompanies these representations which provides an overview of the site’s location, its accessibility and the change in traffic flows that might be expected.

It concludes that:

• The site is located within walking distance of wider facilities offered in the village, local amenities and public transport.
• Bus stops providing access to a number of routes are located within walking distance from the site and Shalford train station provides regular services to London and Reading.
• The level of traffic likely to be generated by a residential use will be comparable with the existing levels of daily activity and as such would not be expected to have a noticeable impact on the operation of the public highway.

Landscape and Visual Commentary (BBP-6)

The landscape and visual commentary provided by Scarp seeks to:

• Outline landscape and visual appraisal of the site and its surroundings,
• Guide the preparation of the master plan for the proposed residential development, and
• Provide a commentary on the effects of the preliminary development proposals on the local landscape and on existing views and visual amenity.

It advises that:

• The development proposal would have many positive effects on local landscape character and visual amenity.
• The proposed development would also introduce an architectural style and materials with a stronger sense of local distinctiveness.
• The existing green corridor alongside the river would be widened and enhanced in landscape and ecological terms.
• Green belt openness would be enhanced by an overall reduction in building heights and volume and by the reduction in the amount of hard-standing on the site.
• The development proposals would enhance the rural setting of the Wey floodplain.
• The widening of the green corridor alongside the river would allow for enhanced footpath access to the River Wey, creating a recreational route that would be safer and more inviting in terms of fewer blind-spots and less dominated by large-scale built form.
• The proposed set-back of buildings away further from the Wey and Godalming Navigations Conservation Area and the establishment of a wider, more robust tree/shrub framework would enhance the setting of the conservation area.
• The enhanced enclosure of built form on the site, as recommended by the Guildford Landscape Character Assessment and Guidance, would help conserve and enhance the pastoral character of the floodplain and the rural character of views from the River Wey.

Phasing within Plan Period

The majority of the site will be available for redevelopment in 2019 following vacant possession. Subject to planning, it is envisaged that units could be delivered on the site 2/3 years later therefore a delivery timetable of circa 5-10 years in line with GBC LAA 2016. The redevelopment of Bishopsgate House will be later in the plan period, circa 10-15 year delivery period.

Delivering Sustainable Development

The NPPF states that the purpose of planning is to help achieve sustainable development. Paragraph 7 states that there are three dimensions to sustainable development, comprising economic, social and environmental roles.

Paragraph 8 emphasises the need for the planning system to balance these different dimensions.

The fundamental precept of the NPPF is a presumption in favour of sustainable development and Paragraph 14 states that this should be seen as a golden thread running through both plan-making and decision-taking.

In the Table 5 below, we summarise how the proposals for Broadford Business Park comply with the definition of Sustainable Development as described in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: PSLPS16/7988  Respondent: 15693153 / Zurich Assurance Ltd  Agent: Barton Willmore LLP (Sinéad Morrissey)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
SUMMARY AND CONCLUSIONS

In summary, Zurich’s overall conclusions in responding to the Proposed Submission GBLP consultation are as follows:

1. Zurich supports GBC’s proposal to meet OAN in full;
2. Zurich is wholly supportive of GBC’s proposals to allocate land at Broadford Business Park for residential development purposes in accordance with the redevelopment of PDL in the Green Belt set out by the NPPF;
3. Broadford Business Park meets the deliverability tests set out in paragraph 47 of the NPPF;
4. The Site is within the single freehold ownership of Zurich meaning it is immediately available for development;
5. GBC should give further consideration to the inclusion of viability considerations when assessing the provision of affordable housing and planning obligations on new development sites;
6. The Site is sustainably located for future housing growth, being able to deliver a meaningful level of new and affordable housing;
7. Zurich is supportive of GBC’s economic development objectives and the removal of the strategic employment site designation from the Site. GBC’s economic development objectives will deliver a range of employment opportunities in line with GBC development strategy.

Zurich is committed to collaborative working with GBC, its partners, key stakeholders and the local community to ensure the future development of Broadford Business Park comes forward in a timely manner and in the early part of the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  [BBP-1 Reg 19 Reps.pdf](#) (1.7 MB)

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Flood Risk Advice Letter (BBP-4)

A Flood Risk Advice letter has been prepared by WSP to accompany these representations. It provides a brief assessment of the baseline assessment of flood risk, climate change and drainage and concludes as follows:

“In summary, the site is located in Flood Zone 1, 2 and 3, but mainly Flood Zone 2 Residential development should be preferentially located in Flood Zone 1, followed by Flood Zones 2 and 3, as discussed in Sequential and Exception Tests. To allow for climate change, a basic assessment assumes the 1 in 100 plus climate change level to be 34.80m AOD. It is recommended that further discussions with the Environment Agency are undertaken to agree an approach for estimating the climate change level.

As shown by the GBC SFRA’s the site is sequentially appropriate for development as although there are preferential site outside the flood plain the required allocation for development cannot be met in these areas and that - ‘The LAA and sequential test Based on the current information available and the above assessment, and on the understanding that residential development is located above a level 34.80m AOD including suitable mitigation and management measures are utilised it is concluded that the proposed development is considered appropriate from the perspectives of flood risk.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  [BBP-4 Flood Risk Advice Letter..pdf](#) (760 KB)
[BBP-1 Reg 19 Reps.pdf](#) (1.7 MB)
**Comment ID:** PSLPS16/8320  **Respondent:** 15693153 / Zurich Assurance Ltd  **Agent:** Barton Willmore LLP (Sinéad Morrissey)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Transport Note (BBP-5)*

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- The level of traffic likely to be generated by a residential use will be comparable with the existing levels of daily activity and as such would not be expected to have a noticeable impact on the operation of the public highway.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- [BBP1_Reg_19_Reps-1.pdf](#) (736 KB)
- [BBP6_Transport_Note.pdf](#) (202 KB)

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**Comment ID:** pslp172/4093  **Respondent:** 15705761 / David Jenner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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 brownfield sites from the Plan (Sites A4, A34 and A44). The Council claims to have adopted a "brownfield first approach" (page 5 of Plan) but this is clearly not the case and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1098  **Respondent:** 17241889 / John Hackney  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

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: pslp172/2594  Respondent: 17325665 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of Brownfield site (A34) from the Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2595  Respondent: 17325665 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2725  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Refer to attached reports for evidence why our client considers that Broadford Business Park should be re-instated as a residential site allocation, as per draft Policy A34.
6.1 The NPPF states that the purpose of planning is to help achieve sustainable development. Paragraph 7 states that there are three dimensions to sustainable development, comprising economic, social and environmental roles. Paragraph 8 emphasises the need for the planning system to balance these different dimensions.

6.2 The fundamental premise of the NPPF is a presumption in favour of sustainable development and Paragraph 14 states that this should be seen as a golden thread running through both plan-making and decision-taking.

6.3 As previously accepted when GBC allocated Broadford Business Park for residential development, the Site complies with the definition of Sustainable Development as described in the NPPF. A residential development would be economically, socially and environmentally sustainable, and critically it would provide much needed housing, thus contributing to GBC’s 5YHLS.

6.4 Table 4 summarises how the proposals for Broadford Business Park comply with the definition of Sustainable Development as described in the NPPF.

[Table 4]

Case for maintaining the residential site allocation

6.5 As set out in Sections 1.0 and 4.0 of these representations, Zurich objects to the designation of Broadford Business Park as a LSES, and maintains the view that a residential development is the most appropriate use for the Site.

6.6 The Site is previously developed land in the Green Belt, and in view of the lack of suitable sites within Guildford’s urban areas and villages, the release of additional sites in the Green Belt and surrounding countryside is required. Broadford Business Park provides an opportunity to contribute towards GBC’s housing needs with a negligible impact on the openness of the Green Belt and the purposes of including land within it.

6.7 As identified by the redacted policy A34 set out in Table 5, GBC previously considered the site to be a deliverable residential site, with capacity for up to 100 homes.

[Table 4]

6.8 This draft policy was supported by the Land Availability Assessment (2016). Consistent with the deliverability tests described at footnote 11 to paragraph 47 of the NPPF, the 2016 LAA considers the suitability, availability and achievability of new development sites. In relation to Broadford Business Park (ref. 2186) the 2016 LAA stated:

“This site is most suited for residential development, to provide new homes to meet the identified need.”

6.9 It was also noted that development could take place from 2018, with the delivery phased in accordance with the building leases set out in Table 2.

Evidence previously submitted in support of residential development

6.10 Zurich supported previous residential allocation as part of their representations submitted in response to the previous Regulation 19 consultation in July 2016. The representations were accompanied by the following technical reports to demonstrate that the Site is free from insurmountable constraint and meets deliverability tests referred to in paragraph 47 of the NPPF.

• Design Statement – This included an illustrative masterplan to highlight the residential opportunities for the Site and demonstrate that the Site had capacity for 100 dwellings;

• Commercial Refurbishment Viability Report (since updated) – This set out why the continued employment use of the Site was no longer viable, including reference to the Sites condition and demand for such employment floorspace;

• Flood Risk Advice Letter (since updated) – This set out clearly the potential risk from flooding and identified what mitigation measures could be employed to both prevent flooding on site and improve the local flood risk levels generally;
Landscape and Visual Commentary – This highlighted that a residential development would present opportunities to improve the visual impact of the Site on the Green Belt and the wider landscape; and

Transport Note – This acknowledged the transport impact of the existing employment use and concluded that the level of traffic likely to be generated by a residential use would be similar to the existing use.

6.11 Since the 2016 GBLP consultation, there have been no material developments which would alter the conclusions of these reports, or the assessment of the Site contained within the 2016 LAA (ref. 2186).

6.12 An updated Commercial Viability Report, as discussed in Section 4.0, and Flood Risk - Sequential Test Assessment have been prepared in response to the updated evidence base that accompanies the latest consultation on the emerging GBLP to demonstrate the planning case for a residential development remains.

Commercial viability

6.13 The updated CVR (and associated financial appraisals) considers the following:

• Whether the existing buildings are suitable for refurbishment or whether they have reached the end of their economic life.
• Whether redevelopment of the site for employment use is economically viable.
• Whether there is a need for this current space within the Borough for employment purposes or whether there are better suited locations.

6.14 The report advises that the existing buildings are failing and the considerable cost of their refurbishment is not a viable option for a developer. It also confirms that alternate employment uses on the site as part of a redevelopment proposal would be unviable and, in any event, the site is not best placed for such a use in terms of location or demand. Its concluding remark is:

“Refurbishment of the existing office stock or the redevelopment of the site with a new office scheme will not offer a viable proposition for developers or investors. If the Property were to be brought to the market in its current form we are of the opinion that demand will be from residential developers.”

6.15 A detailed assessment of the CVR is provided in Section 4.0 of these representations.

Flood risk sequential test

6.16 As previously noted, the Site lies partly within Flood Zone 1, 2 and 3. When considering the flood risk implications of new development in areas prone to flooding, the PPG states that:

“A local planning authority should demonstrate through evidence that it has considered a range of options in the site allocation process, using the Strategic Flood Risk Assessment to apply the Sequential Test and the Exception Test where necessary. This can be undertaken directly or, ideally, as part of the sustainability appraisal. Where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decision to allocate land in areas at high flood risk in the sustainability appraisal report. The Sequential Test can also be demonstrated in a free-standing document, or as part of strategic housing land or employment land availability assessments”[14].

6.17 Zurich have noted that GBC have not included an updated Flood Risk Sequential Test as part of the updated evidence base for the GBLP. Therefore, in order to give GBC comfort that the Site would continue comply with the sequential test requirements.

6.18 WSP’s assessment demonstrates that the Site is sequentially better than the alternative sites and that there is no requirement for the Exception Test to be considered at this stage. The site should therefore be allocated for residential use.
6.19 Notwithstanding this, Zurich would recommend that GBC updates its Flood Risk Sequential Test prior to submission of the GBLP for examination in order to ensure the evidence base is robust.

**Deliverability of residential proposals**

6.20 Zurich is committed to ensuring the optimal amount of new homes are delivered on the Site in order to provide a meaningful contribution to the GBC’s housing needs, including the unmet housing need from Woking Borough Council, at an early stage within the plan period. The Site continues to be free from insurmountable constraint, including passing any updated flood risk sequential test should look to undertake.

6.21 As explained in Section 2.0 of these representations, the Site is wholly within the single freehold ownership of Zurich. The majority of the Site will be available for redevelopment by 2019 through vacant procession, with Bishopsgate House available to be included as a second phase by 2022 (still within the first five years of the plan). As a result of the progress in the preparation of the Local Plan being delayed, the site would now available for development within the first 5 years of the plan period, which will provide a meaningful contribution to the borough’s short term and urgent housing needs and as well as GBC’s unfulfilled 5YHLS.

6.22 Zurich does not consider that the Site’s circumstances have materially changed since it was found to be suitable and allocated for residential development in 2016. With it having been demonstrated that the designation of the site for employment purposes is unsustainable and the clear evidence showing that residential site allocation is deliverable, Zurich strongly advocates that GBC reconsider the decision to allocate Broadford Business Park for employment use, and recognise the potential of the Site to deliver much needed housing in GBC. Housing which can be delivered in the short term, subject to planning.


7.1 Zurich consider that the GBLP prepared by GBC has adopted an approach that is not ‘positively prepared’, ‘justified’, ‘effective’ or ‘consistent with national policy’. Therefore, the GBLP fails to satisfy the ‘soundness’ tests outlined in paragraph 182 of the NPPF.

7.2 In summary, Zurich’s overall conclusions in responding to the GBLP consultation are as follows:

• Zurich supports GBC’s improve housing delivery in the borough, the current housing target cannot be considered as meeting OAHN in full as required by the NPPF, on the basis that the GBLP currently only seeks to meet the OAHN for Guildford, despite there being an unmet need in WOK;

• Zurich recommends that GBC should proactively seek to meet full OAHN by reconsidering those sites removed as part of LAA2 in order to meet this unmet need and improve affordability in the borough;

• The existing buildings at Broadford Business Park are poor quality and in need of substantial investment, which is unlikely to be forthcoming in view of local market conditions. The current proposal to designate Broadford Business Park as a ‘Locally Significant Employment Site’ is therefore not viable or sustainable in the medium to long term;

• The Site continues to pass the flood risk sequential test required to support the GBLP. Notwithstanding this, GBC should update its flood risk sequential test to be based on the latest list of sites contained within the 2017 LAA2 prior to the GBLP being submitted for examination;

• Site specific technical work supports Zurich’s conclusion that the Site is suitable for release from the Green Belt, and initial development proposals demonstrate that future development would meet the objectives of the GBLP, would be ‘deliverable’ in accordance with footnote 11 of paragraph 47 of the NPPF and would represent a sustainable residential development;

• “Exceptional circumstances” exist to release additional Green Belt sites beyond those currently included within the GBLP, in order to seek to meet full OAN;

• The Site is capable of delivering a meaningful level of new market and affordable housing; and
• The Site is within the single freehold ownership of Zurich with the existing tenant leases due to expire shortly or have break clauses available meaning that any redevelopment for residential purposes could come forward in the first five years of the plan.

7.3 GBC acknowledge that there is an acute shortage of housing in the borough that makes the borough one of the most unaffordable places to live in the UK. These representations have demonstrated that the Site is not a suitable location for employment uses and refurbishing/replacing the existing buildings to an acceptable standard is not a viable proposition, thereby meaning the Site would be likely to become derelict. When weighed against the chronic housing shortages in the borough, Zurich consider that the need for housing clearly outweighs protecting the Site as an unviable employment location.

7.4 Therefore, in order for GBC to be able to meet its full OAN, or increase its ability to do so, the list of site allocations should be amended to, at the very least, include sites that were included in the previous version of the GBLP consulted upon in June/July 2016. Similarly, Zurich strongly believes Policy A34 should be reinstated, with Broadford Business Park allocated for residential use to meet the identified housing need.

7.5 Zurich would welcome an opportunity to discuss our findings in more detail with the Council’s officers and members, prior to the GBLP being finalised and submitted to the Secretary of State, in seeking to resolve the objections and ensure that the plan can subsequently be found sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Re-instate Broadford Business Park as a residential site allocation as per draft Policy A34.

Attached documents:

- Commercial_Viability_Report_July_2017_plus_app.pdf (4.9 MB)
- Broadford Business Park - Sequential Test.pdf (63 KB)
- 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)

Comment ID: pslp172/2777  Respondent: 17357249 / E Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of brownfield sites A4 and A34. The council has not adopted a ‘brownfield first’ approach.

I therefore strongly object to all proposed development A34, A43, A58, A42 on the grounds that the area will be grossly overcrowded causing urban sprawl. The roads are already at maximum capacity. One small breakdown occurrence in area causes vast traffic jams. I also object to the fact that the Guildford Borough Council ignored the thousands of objections from the Send/Ripley area and instead increased the allocation of housing etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3079  Respondent: 17383969 / Maureen Mitchell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

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: pslp172/3180  Respondent: 17399681 / Anthony Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is wrong in principle to remove Brownfield sites (A4 and A34) from the Plan. To comply with national guidelines, such sites should be developed first before consideration is given to greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3416  Respondent: 17412193 / Beryl Evans  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3710  Respondent: 17424897 / Peter Sanderson-Byrne  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.
1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3895  Respondent: 17434049 / Lucy Starke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3981  Respondent: 17440705 / Chris Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) and makes out this is an important aspect of the plan but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4222  Respondent: 17462657 / Malcom Scott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34
<table>
<thead>
<tr>
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I object to removal of brownfield site (A34) from the plan: Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. GBC claims to "have adopted a ‘brownfield first’ approach" (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 68.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: A35 - Former Wisley airfield, Ockham
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPS16/542  Respondent: 8553761 / A Howlett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1363  Respondent: 8555041 / Adrian Platt  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 development of the Wisley site and am astonished that GBC has even considered including the site in the Local Plan, especially since planning has already been refused. Whilst I agree that the Wisley developers have included much needed extra infrastructure, the whole plan completely fails on the traffic issue. Our local roads are already very congested and the roads around the M25 and A3 junctions are mostly chaotic. It would be absolute madness for GBC to consider this plan unless it was for a very small number of houses which did not create the risk of further traffic chaos. Under no circumstances can this site be considered without careful and close discussion with local Wisley and Ockham residents, in particular.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/85  Respondent: 8555041 / Adrian Platt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

On Policy A35 about the proposed Wisley development, I strongly believe that it is still irresponsible to consider the high number of 2,000 houses. Whilst I am delighted about the infrastructure that the scheme would provide, the benefit of this is totally outweighed by the extreme traffic problems that this scheme would cause. One of you officers told me that there would be a bus every 15 minutes to reach East Horsley and its station. This was put forward as a solution for the traffic chaos but firstly the frequency and size of buses in our narrow lanes would be appalling and secondly the lack of frequency of use of buses in our area would not solve the problem. Whilst your latest plan does cover collaboration with National Highways to find smooth flow through the Wisley roundabout and onto the A£/M25, I really do not believe that
your team understand what chaos there is on those roads at many times of day. In order to have an acceptable solution, a really massive investment would be needed. I generally support the concept of using Wisley for a good number of houses but believe that the acceptable number may be nearer to 1,000. I know that this may not be enough houses for the developers to provide their proposed infrastructure but let us remember that this would not just be for the benefit of new Wisley residents. All local residents will need this infrastructure before other houses in the Horsleys are built. I suggest employing a special expert to examine and advise on what is really practicable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6149  Respondent: 8555073 / Adrian Bathurst  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although their planning application was refused, the developers continue to promote their proposed sustainable development “based on Garden City principles”. In my opinion this site will not deliver the concept successfully. As each phase of the development is completed the residents will find their promised quality of life degraded by the increasing frustrations of daily travel.

Being a popular London commuter area I would expect any major new development in the borough to have easy access to a railway station that is able to provide a service capable of handling a large increase in passenger numbers; only suburban stopping services are provided from the two nearest stations and peak time trains into the capital are already over capacity; the operators, South West Trains, have seen passenger numbers more than double in the 20 years that they have held the franchise and are currently running the maximum number of trains possible; there is no mention of the impact on rail services in the IDP.

The rural area means that many workplaces and schools will not be covered by any public transport offering so the car will be the only satisfactory method of transport. Although employment opportunities are proposed, the percentage of residents that will be employed there is difficult to predict and it is likely that a significant number of workers would commute from other districts by car. There will be a vast increase in traffic volumes in the villages, the promised significant bus network adding to the problem, gridlocked rush hour roads are inevitable. Many of the sustainable transport suggestions will remain unsuitable for safety reasons or will simply be incompatible with the busy lives of working families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2551  Respondent: 8555297 / Mrs G M Aish  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Planning Department recommended refusal and the Planning Committee unanimously refused permission on 6th April 2016 for an Application for building 2068 houses and other aspects of the large development on the Former Wisley Airfield. After 14 months of negotiations by the developer in response to widespread serious objections raised by authoritative sources, including Highways England, Thames Water, NATS and the Environment Agency, resolutions could not be found. Since it has been established that there are sufficient brownfield sites and land not in the Green Belt available in the Borough, it cannot be argued that there are exceptional circumstances to justify taking the site 35 out of the Green Belt. I object to Site 35 being taken out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<th>Respondent:</th>
<th>8555297 / Mrs G M Aish</th>
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<td>is Legally Compliant?</td>
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I am disappointed that my previous objections to the draft local plan have not been reflected in the latest draft. Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. No effort has been made to demonstrate exceptional circumstances for the removal of any land from the Green Belt. I object that the green belt has been preferred over brownfield land in the urban area without taking notice of the response to previous consultations.
2. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
3. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
4. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
5. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
6. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
7. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
8. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
9. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
11. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
12. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”
13. Opportunity (3) should be common to all sites and is not unique to this site
14. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.
15. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
16. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
17. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification
18. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
19. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
20. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
21. I object to the fact that the council has failed to remove this site from the local plan despite receiving many thousands of objections from local residents and statutory consultees in two full consultations.
22. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
23. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
24. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.
25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
27. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
28. I object to the Housing number which is unsound and open to legal challenge.
29. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8117</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 2016 / Policy A35</td>
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A35: Land at former Wisley airfield
See comments on questions 1 to 3
See Appendix 4
Policy on green approaches needs strengthening
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/4017  **Respondent:** 8556673 / Andrew French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In addition, a further 2,000 dwellings are proposed at the former Wisley Airfield site, further exacerbating the pressure on local infrastructure, such as local railway stations, schools and public services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/3974  **Respondent:** 8557473 / Mrs Anne Benzecry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposed local plan (June 2016) and to continued inclusion in the plan of former Wisley Airfield, now known as three farms meadows. Allocations A35 – for the phased development of new settlement of up to 2100 dwellings.

I object to the above plan for many important reasons.

1. I object to the removal of (FWA/TFM) from the green belt. This serves a vital road in stopping urban sprawl from London
2. I object to the disproportionate allocation of houses in this particular part of the borough. It is not the right area for such developments because of the infrastructure.
3. I vehemently object to the ruining of a historical rural village namely Ockham. It is just not suitable for large amounts of traffic which would be needed to contain all these houses. There are very narrow lanes which flood when under a lot of rain. No street lights and all these this would be a blight on a very lovely village representing English heritage, also included are many listed houses.
4. I object because these roads will be hazardous to cyclists and pedestrians alike
5. I object also on the grounds of air pollution which I gather is already very high in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7413  **Respondent:** 8557761 / Nigel Farley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Former Wisley Airfield**

The Wisley new settlement proposal is contrary to relevant legal provisions and NPPF guidance. It should not form part of the delayed Local Plan when adopted.

In summary, this is because:

**General evidence base is inadequate to support the proposal**

- There is no proportionate evidence base to support such a large and poorly located major allocation which has emerged very late in the LDF. Quite apart from the specific legal deficiencies in the plan-making process relating to this proposed major new settlement (see below), the information provided as the basis for the new settlement proposal is inadequate and at times inconsistent with the guidance and information contained or referred to in the evidence base.

- For example, the application of the "critical mass population of 4000" in section 24 of Volume V of the Green Belt Study (April 2014) does not appear to be justified by the reference works and guidance listed in paragraph 6 of that Volume and it is not justified in relevant paragraphs of the NPPF.

- Appendix B to the Interim SA Report (August 2014) is extremely difficult to read and/or understand. It is illegible unless printed on a scale too large for A3 printers and the electronic version is difficult to read. This appendix should also be supplemented by fuller narrative text to explain and justify the conclusions pithily reflected in the detailed appraisals. It also needs to be expanded to look at possible options on other sites within the relevant settlements that could be sustainably redeveloped to provide the homes and facilities needed.

- Volume V of the Green Belt Study appears to have been prepared on the basis of justifying the Wisley new settlement proposal rather than providing an objective comparison of the green belt impacts of this proposal compared to other more sustainable green belt releases in areas which have existing services and The unexplained application of "critical mass population of 4000" as a cap for this purpose (see above) may be related to the desire to promote the Wisley new settlement instead of the expansion of more sustainable locations in the larger villages.

- Despite the remaining runway and hardstanding areas, the former Wisley airfield site provides a large and tranquil area of countryside, with a network of public access routes, both within and around it, to enable it to be enjoyed by wildlife and the public and affording satisfying public views across the surrounding countryside as well as attractive natural features on the site. The following photographs show views within the Wisley and Ockham Commons area (immediately to the north of the proposed new settlement site) and across the proposed Wisley new settlement. It takes little imagination to see that, even with the proposed SANG, the openness and natural tranquillity of this essentially rural area will be dramatically harmed by the proposed new settlement. (Image 1) (Image 2)

- There are no visual assessments or ecological assessments providing a sound basis for such a radical and unsustainable development proposal.

- There is also no clear evidence in the LDF evidence base to demonstrate that sustainable delivery of the proposed new settlement will be viable or that the timescales within which the necessary public transport and other infrastructure needed to make the new settlement sustainable (if that is even remotely possible) will be deliverable. The unsubstantiated claims to sustainability and the timescales set out in the site schedule for this site and the related evidence base lack credibility, bearing in mind that this is a privately-owned site with no direct rail connection, no existing services or community infrastructure and no meaningful programme for its funding and This is a long way from meeting the principles identified in the studies and guidance referred to in paragraph 21.6 of Volume V to the Green Belt study, as the following quotations illustrate:
"Securing transport links that are public - rather than private transport-based will clearly be a major factor in ensuring that such places advance the cause of reduced carbon emissions."

"It hardly needs stating that excellent public transport is essential to a networked cluster".

- It is also a long way from fulfilling the Core Principles set out in paragraph 17 and paragraphs 29-39 of the NPPF.

- The case studies cited in the Volume V of the Green Belt study show that transport issues have arisen where settlements identified for growth did not have existing access to public transport. The former Wisley airfield site does not adhere to the well-known "beads-on-a-string" concept of growth in the south-east and the London hinterland. However, in contrast with the Wisley new settlement proposal, the expansion of other settlements in the district, including Horsley and Effingham, could function very effectively as networked growth areas in accordance with that concept and with strong sustainable transport links to Guildford, London and other centres of employment, facilities and community services. The rejected draft Guildford Local Plan (due to be re-written after the election in May 2015) and the related evidence base did not appear to have examined properly the opportunities for linked settlements with a "connecting thread of public transport".

- The information presently contained in the LDF evidence base lacks the detail and clarity needed to enable sound comparisons of the impacts and sustainability of the options being considered across a range of This means that local communities are being denied a genuine opportunity to participate on an informed basis in the plan-making process.

- All potential belt releases require properly detailed quantitative and qualitative information to enable sound decisions to be made as to what is the best opportunity for providing sustainable development in the district. Such assessments should be made objectively and on a consistent basis, having proper regard to the principles of sustainability. It is impossible to see how the Wisley new settlement proposal can be justified on the basis of such an approach and there is currently no reliable or proportionate evidence base to justify it or (equally important) to justify rejecting alternative potential allocations in more sustainable locations in favour of the Wisley new settlement proposal.

- There has not been an adequate appropriate assessment in accordance with the Habitats Directive to show that there will be no significant impact on the ecological integrity of the important European Site which is located immediately to the north of the proposed new settlement, albeit with an area of SANG proposed as a buffer.

"Appropriate assessment required at project level to consider impact on the Thames Basin Heath Special Protection Area (SPA) and Environmental Impact Assessment to consider impact on the Site of Nature Conservation Interest".

- A similar statement appears in Table 6 ("HRA Screening of Guildford Site Allocations") on page 45 of the HRA (July 2014).

- These are clear acknowledgements that the proposed new settlement is likely to have significant impacts on the important protected ecological assets in this SPA and that they have not yet been properly. This is an issue that should be properly addressed in an appropriate assessment under the Habitats Directive and a strategic assessment under the SEA Directive before the Local Plan is adopted rather than at the subsequent project stage. This major allocation (and therefore the Local Plan as a whole) cannot be considered to be legally compliant or sound unless and until this has been properly undertaken.

- The proposed new settlement will include development for uses other than residential. In accordance with the specific terms of the Thames Basin Heathlands Special Protection Area Avoidance Strategy 2009 - 2014, the other uses contemplated in this proposed allocation for a mixed use new settlement is not "exempt" from the need for an appropriate assessment, even if such an exemption could conceivably be claimed for a 2500 residential development on a land so close to the SPA (which is highly doubtful).

- The mix of uses proposed on the site, together with the necessary infrastructure works (on-site and off-site) are likely to have significant impacts on the ecology and wildlife in and around the site, with direct and indirect effects on the ecological integrity of the SPA and its ecological...
• For example, the country lanes that would serve the proposed Wisley new settlement are already dangerous for pedestrians and cyclists to use -the widening and other "urbanising" works needed to make them safe (as a means of sustainably accessing good public transport and other facilities in Guildford, Effingham, Horsley and other existing settlements) will have serious impacts on habitats, as well as in terms of "urban" encroachment into the countryside, with the likely loss of hedgerows and woodland as well as other valuable habitats and open There is no sign that such impacts have been meaningfully addressed in the Interim Sustainability Appraisal Report (August 2014) or in the HRA (July 2014) or in the Green Belt Study (April 2014).

• The proposed new settlement will occupy land and habitats that are likely to be functionally related to the European Site (which also comprises the SSSI) and the species it supports. Such impacts must be assessed before any such allocation could be promoted. On the basis of the current information in the evidence base there can be little doubt that the proposed new settlement may cause significant ecological harm to these internationally valuable habitats and to the Priority species that they support, despite the proposed SANG area which is to address principally the human intrusion impacts on ground-nesting birds. Other aspects of harm have not yet been described or assessed.

• Such harm would not be justified under Article 6 of the Habitats Directive or the UK regulations transposing the Directive into English law, bearing in mind the Annex 1 species and other important flora and fauna identified as being supported by the This attaches a particularly onerous obligation on the LPA in terms of permitting development which might harm the ecological integrity of the site. It is likely that the harm identified in an appropriate assessment will not be capable of being overridden or mitigated to enable the proposed Wisley new settlement to proceed.

Unlawful to allocate without a Sustainability Appraisal, including a proper assessment under the SEA directive and the related UK regulations

• There has not been an adequate Sustainability Appraisal or Strategic Environmental Assessment in accordance with Section 19(3) of the 2004 Act and/or the SEA Directive and/or the 2011 SEA Regulations.

• For example, the ecological impacts referred to in the preceding section are likely significant impacts in their own right and the failure to carry out an SEA on the project (including an appropriate assessment) would undermine the lawfulness of the Local Plan on that ground alone.

• In addition, there are other likely significant impacts of the Wisley new settlement proposal, as generically identified within the SA scoping report, which have not been assessed in any systematic and comprehensive Environmental Report for the purposes of the SEA Regulations.

• This appears to be the result of a last-minute retro-fit of this major and anomalous If the LPA wishes to pursue this development proposal further then the SEA and Sustainability Appraisal of all proposed allocations should be re-visited so as to ensure that an objective and unbiased assessment of all reasonable options is taken before the forthcoming draft Local Plan is adopted. For example, the provision of significantly increased services and facilities is presumed not to be practicable or deliverable in the context of the larger villages identified for growth in the Settlement Hierarchy, whereas in relation to the Wisley new settlement proposal their provision is presumed to be viable and deliverable with minimal (if any) economic or viability appraisal or programming.

• The question of whether sustainable transport objectives will be fulfilled has not been properly assessed or Judged by the SA objectives relating to sustainable transport and climate change, this proposal for a new settlement should be rejected because the site is remote from public transport facilities and the level of services and facilities needed to encourage sustainable transport choices. It is unlikely to be other than a highly car-dependent development. The level of development proposed will inevitably generate large numbers of car trips which will use the rural roads in this area which are not adapted for safe pedestrian or cycle trips. There has been no attempt to describe or assess these proposals (or the necessary mitigation measures and the likely impacts of such measures) in the context of these important policies or to compare these impacts with the benefits and impacts of reasonable alternatives which are better located to avoid or mitigate such impacts, including expansion of the existing urban areas or the larger villages or sustainable networks of settlements.

• Recent studies by Surrey County Council and Guildford Borough Council in relation to traffic congestion and air quality point to the inappropriateness of the proposed allocation of a new settlement close to an already heavily congested trunk road and junction (M25/A3 Junction 10) and in a location which is unlikely to encourage sustainable travel Such studies add to the strategic importance of ensuring that Guildford's growth is
capable of being achieved on the basis of a sustainable transport strategy rather than encouraging a large-scale, car-dependent scheme such as the proposed Wisley new settlement.

- The last minute and superficial assessments in the Interim SAR (August 2014), the HRA (July 2014) and Sections 22 to 24 of Volume V of the Pegasus Green Belt Study (April 2014) are inadequate and provide scant justification (if any) for the harm to the green belt and environment that will inevitably be caused in this attractive and environmentally valuable part of the green belt. Whilst the site undeniably bears the signs of its past airfield use, the remaining structures are almost all surface level (runways and hard-standing areas) with virtually no above-ground built structures or other features which undermine or harm the openness of the green belt. There are also clear signs of the runways being "naturalised" over time by vegetation and the rural character and beauty of the areas around site is predominant.

National Planning Policy Framework (NPPF) and the importance of community engagement

- There is clearly massive community opposition to the proposed allocation of the former Wisley airfield as a new settlement and such opposition is based on sound sustainable planning principles.

- The Habitats and SEA Directives (and the regulations transposing them into English law) require such assessments to be carried out and to be properly consulted upon (including public consultation as well as with the relevant statutory bodies) before the relevant plans and programmes are Failure to do so is unlawful.

- Paragraphs 165 - 167 of the NPPF also require these matters to be dealt with in the plan preparation process and it is clearly inappropriate to promote a major new settlement before the necessary assessment, appraisal and consultation procedures have been completed and consulted upon.

- Reference is made above to the lack of transparency and consistency of approach in the site appraisals at Appendix B to the Interim SAR report (August 2014). Also to the unjustified "cap" on the critical mass level when evaluating the potential for expansion of larger villages which, in contrast with Wisley airfield do have good public transport connections and significant physical and community. It is unclear why other sites within such larger villages (other than those specifically promoted in the plan) are not considered as "reasonable alternatives" for the purposes of the Interim SAR, including sites which might be available for sustainable development if the Horsley inset map were to extend up to the corner of Long Reach and Green Lane (and other possible extensions of the inset boundary). There are likely to be other opportunities for sustainable development in Horsley and other larger villages as reasonable and more sustainable options than the Wisley new settlement proposal.

- Failure to consider and consult upon these reasonable alternatives undermines the LPA's promotion of the Wisley new settlement proposal, in the light of the following guidance in paragraph 52 of the NPPF:

> "The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development."

Summary and Conclusion

The LPA should abandon the proposed Wisley new settlement allocation and refuse permission for this application because:

- It has not been properly assessed in accordance with Section 19(5) of the 2004 Act and/or the Habitats Directive and/or SEA Directive and/or paragraph 165-167 of the NPPF and the relevant regulations as referred to above;

- It is in an unsustainable location which is likely to result in a very large car-dependent community causing serious harmful impacts on road safety (particularly pedestrians and cyclists using the rural lanes around the site), traffic congestion and air quality;

- Its proximity to the SPA, SSSI and SNCI and the scale and character of the proposed mixed-use development will seriously harm the ecological value of these important sites and other valuable ecological assets in the area;
• The large-scale development of this attractive, large and tranquil part of the green belt will be inconsistent with
the objectives of green belt policy and will harm the public interest in maintaining and enhancing the
valuable network of public ways and routes through and around the site and the attractive countryside views
and experiences they provide.

In the light of this, the LPA should seriously reconsider drawing village inset boundaries and making additional
residential and other allocations to provide for sustainable development in larger villages and settlements which will:

1. encourage sustainable transport choices, including walking, cycling and public transport;
2. strengthen the well-located larger villages to achieve "critical mass" populations of 4000-5000 (or sustainable
networks of larger villages and settlement) in accordance with the guidance and studies referred to in paragraph
6 of the Green Belt Study (April 2014) to enable them to sustain and increase the quality and range of services
and community facilities that they could provide and in the interest of a better environment and the well-being
of the communities that live there; and
3. allocate suitable sites for development within and on the edges of such settlements so as to enable such
settlements to be master planned to ensure that high quality and integrated designs produce developments to
improve the overall quality of the settlements and the well-being of the communities living there, whilst
properly protecting the landscapes and rural environments in which they exist.

I trust that these representations will be of assistance to the Local Plan consultation process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: IMAGE 1.jpg (591 KB)
IMAGE 2.jpg (131 KB)
Land at Wisley Airfield (Site A35)

Report page: 14

WHPC view: Objects Strongly

In brief: Inappropriate development in the Green Belt. Refer to Planning Officer’s Committee Report on application 15/P/00012 for reasons for Planning Committee’s Unanimous Refusal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5660  Respondent: 8563489 / Mr Christopher J Norman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

We object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. We object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. This land has been farmed for many years and is good quality farmland.

3. We object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. We object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). The local infrastructure simply cannot support additional traffic and required facilities.

5. We 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.

6. We object to the detrimental impact on transport, local roads and road safety, and specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. There is no parking elsewhere near the stations.

7. We object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. We object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. We 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.

10. We object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to the Guildford Borough Council Draft Local Plan (June 2016) and in particular to inclusion in the plan of Site Allocation A35 - the former Wisley Airfield - for a new settlement with 2,000 dwellings,

The Trust writes to object to aspects of the draft Local Plan.

The Trust has approximately 1,100 members, some from within the Borough of Guildford including Ockham. Most of that membership that resides in the Cobham area uses the resources of the Borough of Guildford, including the villages and the countryside for recreational purposes. The Trust submitted objections to applications relating to the Former Wisley Airfield site numbered 13/P/02165, 14/P/01664 and 15/P/00012, all of which were refused. It also filed comments on the draft Local Plan submitted for consultation in 2014, when it objected to the inclusion of the former Wisley Airfield site for consideration for development. That draft was subsequently withdrawn and the Trust is concerned that the large number of objections to that may not be replicated here because of the frequency that these have had to be made in the planning process.

While, therefore, the majority of our members may not live in the Borough of Guildford they have a greater interest in much of what goes into the Guildford Local Plan for their local area than those living on the far side of the borough.

The draft Local Plan now submitted for consultation has many of the flaws that were in the previous draft. In this response the Trust has felt that it should lead on and give most attention to the Plan’s approach to the Green Belt and inclusion of the former Wisley Airfield site (Policy A35).

The site of the former Wisley Airfield

The Trust does in particular object to the inclusion in the draft Local Plan of Policy A35 relating to the site of the former Wisley Airfield and surrounding area and involving 2000 dwellings, and other building. It is said that the evidence for need for this is in the SHMA being used.

The size of the development that might be achieved at the site actually makes it unsustainable.

The Trust points to the South East Regional Plan not being revoked as to preventing new residential development close to the Thames Basin SPA, part of which lies just north of the site.

This is a much loved open area by those living in the south of Elmbridge that is Hatchford, Downside, Cobham and Stoke D’Abernon. The proposal for 2000 dwellings is not sustainable for many reasons. The site is in some beautiful countryside that would be devastated by the development. It is too close to the SPA and would result in the destruction of the Site of Nature Conservation Interest (SNCI). Proposals for this housing resulted in the unanimous refusal of application no.15/P/00012 which showed that it would have been delivered by apartment blocks up to 5 storeys, alien to the area and with a density higher than most London boroughs. Openness and important views would be marred from a number of directions including that from Painshill Park Landscape Gardens

The proposals for 2000 dwellings with other buildings, involving the introduction of some 5,000 new residents, are not sustainable for many reasons. To place them in context as to the increase in population, it would result in an increase of the equivalent of 50% of the population of nearby Cobham, having a significant adverse effect on the infrastructure of the southern part of the Borough of Elmbridge as well as the northern part of the Borough of Guildford. There would be significant wider effects on strategic infrastructure not only in Guildford but also Elmbridge, Mole Valley, Woking and further afield

A settlement here would create, on presently open country, a line of building that would start to merge settlements to become the urban sprawl that the Green Belt exists to prevent.

Green Belt
The site is entirely in the Green Belt. It was not contemplated for development for the existing Guildford Borough Council Local Plan 2003 or the South East Regional Plan. The Green Belt was established by and is protected by Acts of Parliament.

The starting point for consideration of taking any site out of the Green Belt is Paragraph 83 of the NPPF which confirmed that Green Belt boundaries can only be altered in exceptional circumstances through the preparation of the Local Plan. The only exceptional circumstance suggested in the draft Local Plan is the pressure to build more dwellings and that arises from flawed housing target figures. The proposed development would clearly impact negatively on the openness of the Green Belt and would be considered inappropriate development within the Green Belt under paragraph 87 of the NPPF. Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Under paragraph 89 those very special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. The proposals for development at the site clearly fail at these hurdles.

There have been assurances by the government that unmet housing need, even if provable, is unlikely to outweigh the harm to the Green Belt and constitute exceptional circumstance (Ministerial Statement on the 17 January 2014 and letter from Brandon Lewis mentioned above).

There has been a tendency to portray this site as if it were a previously developed brownfield site (including emphasis on the remnant of the old runway) and it is worth noting that the runway and hardstanding are but a small part of the site. If the hard-core that is the runway were not to be removed for whatever reason such as viability, in due course, like the remains of many such sites in other parts of the country or the world, the runway would eventually disintegrate and return to agricultural land or nature, as was promised when it was requisitioned during the last world war. The vast majority of the site is good quality agricultural land recently advertised by the owners as Grade 3 and being arable land that has been farmed for many years.

Wildlife

The Trust is very concerned about protecting, and indeed expanding, Special Protection Areas (SPAs) and Sites of Special Scientific interest (SSSIs). The Trust supports the position of Natural England and the Campaign to Protect Rural England (CPRE) that studies show the need for the Green Belt to be protected as an integral component of England's ecological network and the additional views of the RSPB as to protection of biodiversity. While there may be scope for a developer to suggest Suitable Alternative Natural Green Spaces (SANGs) in an area, it is impractical to find any sufficient such sites in the borough or adjoining boroughs that are not already protected in some way. Already agricultural or wooded land should not be used as recreation land in order to justify building on other green spaces nearby.

In the application no. 15/P/00012 the applicants sought to include an onsite SANG in supposed mitigation. That was illogical as it would create an additional multi space car park and would only have increased visitor numbers to the nearby SPA rather than draw them away.

The introduction of residences would mean the import into an ecologically sensitive area not only of humans, and increase in their footfall, but also of pets. Studies of the effect of dogs and cats in particular have shown just what a devastating effect this would have on wildlife. There is no answer to the effect of the introduction of humans and of pets would have on wildlife and wildlife corridors and damage to habitats of the protected and endangered rare species in contravention of the EU Birds Directives and Habitats Regulations.

Local Roads and transport

Looking at how the proposal to have a settlement of 2000 at the site would impact on transport, there would still need to be reliance on vehicles for work and other needs and for delivery. It would be impossible to provide enough jobs for residents in the area of the development which would result in a substantial increase of traffic on the local road network. This suggested site for development is far removed from local stations and has no existing access to public transport. It is unrealistic to assume that residents will not rely on the private car and reliance on private car or buses cannot meet requirements for a low carbon, sustainable economy. It is impossible to provide safe walking and cycling routes to the nearest station particularly in winter as the surrounding lanes are narrow and unlit. Further, public transport would itself
be limited by the weight restrictions imposed on surrounding roads which are narrow and unsuitable for Public Service Vehicles.

In application no. 15/P/00012 the applicants incredibly suggested that stations are within easy cycle distance. Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

Given how main roads (and in particular the M25 and A3) become jammed at various times, adding to the number of motorists, development in this rural area would result in the use of more local roads as rat runs. The Trust would be particularly concerned for the additional traffic on the very narrow and winding Ockham Lane and Plough Lane locally.

Cobham is the closest shopping centre to the proposed development. It already serves many from the areas of Ockham, the Horsleys and Effingham with traffic along Horsley Road and Downside Road, Ockham Lane and Plough Lane. Cobham is only 4.5 miles from the proposed development whether one used Old Lane, Horsley Road and Downside Road or the A3 and the A245 - Guildford is by comparison 7.5 miles from the proposed development. The village could not cope with the additional traffic and car parking involved in serving an additional 5,000 residents at the site and would experience a significant increase in traffic from the development. Cobham would experience increased stationary traffic at junctions. Traffic congestion has an impact on health and Cobham High Street is an Air Quality Management Area arising in part from the proximity of the A3 and M25 and there are identifiable health problems already arising from this. To add to the traffic here would exacerbate that.

One of the stations that in application no. 15/P/00012 the applicants claimed would adequately service the increased population (much of which is likely to commute) is Cobham & Stoke D’Abernon (the local rail stations of Effingham and Horsley could not cope). The route to that station is either by way of Downside Road or by way of the A3 and A245. Additional pressure would be placed on parking at this station and overcrowding at peak hours would increase, quite apart from the impact of vehicles using local roads for the purpose of getting there. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

In that application the Trust supported Elmbridge Borough Council’s objections on the grounds that the development would have a significant impact on the highway network.

There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic.

**Air quality**

There would be an increase of around 5,000 residents at the proposed development site with possibly an additional 4,000 vehicles. The air quality surrounding the site of the suggested development already causes concern, for instance levels of NO2 already exceed the EU limit due in part to the proximity of the M25, the A3 and Cobham Services on the M25. Additional traffic would worsen the situation, affecting the health of all current and future residents in the area.

**Summary of objections to this site**

Objection is supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

The only exceptional circumstance that might be advanced, with all other matters were discounted, is housing need. Insofar as that may rely on evidence tendered for that it does not bear any extensive examination and the government has anyway made it clear that housing need alone is not sufficient.
There would be a loss of Green Belt and countryside used for leisure purposes and an immense effect on biodiversity. The development would affect not only the surrounding natural land but add to the danger of losing rare species that need protection.

The land is close to the M25 and A3 junction and would increase the number of vehicles using these busy roads on a daily basis, cause further extensive use of inadequate local roads and cause further pollution. Surrey is very poorly served by public transport and any new residents would be reliant on private transport.

A new settlement here would absorb the hamlet of Ockham. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. There is no realistic account taken of general organic growth and other proposed developments and impact on traffic and infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/4103  **Respondent:** 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Objections to the Guildford Borough Council Draft Local Plan (June 2016) and in particular to inclusion in the plan of Site Allocation A35 - the former Wisley Airfield - for a new settlement with 2,000 dwellings,**

The Trust writes to object to aspects of the draft Local Plan.

The Trust has approximately 1,100 members, some from within the Borough of Guildford including Ockham. Most of that membership that resides in the Cobham area uses the resources of the Borough of Guildford, including the villages and the countryside for recreational purposes. The Trust submitted objections to applications relating to the Former Wisley Airfield site numbered 13/P/02165, 14/P/01664 and 15/P/00012, all of which were refused. It also filed comments on the draft Local Plan submitted for consultation in 2014, when it objected to the inclusion of the former Wisley Airfield site for consideration for development. That draft was subsequently withdrawn and the Trust is concerned that the large number of objections to that may not be replicated here because of the frequency that these have had to be made in the planning process.

While, therefore, the majority of our members may not live in the Borough of Guildford they have a greater interest in much of what goes into the Guildford Local Plan for their local area than those living on the far side of the borough.

The draft Local Plan now submitted for consultation has many of the flaws that were in the previous draft. In this response the Trust has felt that it should lead on and give most attention to the Plan’s approach to the Green Belt and inclusion of the former Wisley Airfield site (Policy A35).

**Green Belt - POLICY P2**

The Metropolitan Green Belt covers 89% of the borough. Its existence and retention should be one of the fundamental bases of the Local Plan. Policy P2 does not have any proper assessment of the Green Belt’s value. Building on the Green Belt means a loss of agricultural production, open space, biodiversity, natural heritage, rural views, rural leisure amenities (with benefits to public health and wellbeing as aimed for in paragraph 81 of the National Planning Policy Framework (NPPF)), water catchment and flood control. It also means an increase in air pollution by loss of carbon and particulates being captured by vegetation.
There is insufficient commitment in the draft Local Plan to the permanence of the Green Belt. Surrey County Council have voted unanimously to protect the Green Belt. The draft Local Plan suggests that the Metropolitan Green Belt would be defended but then goes on to propose extensive changes to the Green Belt. The pressure for such proposals comes primarily from flawed housing figures as outlined below and fails to take account of how much more difficult it is to deliver infrastructure to support development outside urban areas. The draft Local Plan looks to impose development where wider consultation could have resulted in acceptance of limited development by communities if it were genuinely for the benefit of local people. The Trust believes there should be more emphasis on the aims of the NPPF and in particular the aim in paragraph 17 of “empowering local people to shape their surroundings”.

With an increase of 13,860 new dwellings suggested during the duration of the Plan, only 2,800 are in urban areas. Urban planning in a number of London boroughs and other authorities provides a good model for urban revival, and in particular in bringing brownfield sites back into play, but many of the planning advances from those areas have not been sufficiently taken into account in the draft Local Plan. 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.

The insetting of two thirds of the borough’s rural villages appears to involve the straightening boundary lines rather than considering how the nature of the Green Belt protects countryside. The proposals extend the power of developers out of all proportion to genuine local needs. In any event until such time that the evidence is robust enough to be considered sound, no consideration should be given to changing boundaries of the Green Belt. It should continue to wash over settlements close to Cobham such as the Horsleys, Effingham and Ripley.

It is also noteworthy that the South East Regional Plan, as challenged in 2009, had suggested that development on Green Belt land was to be between West Clandon and Burpham. While not advocating any extensive building on Green Belt land, that area was at least closer to the infrastructure that Guildford town offers than development sites now suggested on Green Belt land.

Research available shows that there should be no need to build on the Green Belt. The Green Belt has saved precious countryside from urban sprawl, saved village life and conserved wildlife. Once any part of it is destroyed it is lost for ever and letting any part go in other than in very exceptional circumstances, risks opening the floodgates for further encroachment. It is owed to succeeding generations to preserve it. There is no justification to build on the Green Belt until all alternatives in the more sustainable urban areas have been used. Insofar as there is a demand for new housing there are brownfield and other sites in and around urban and semi-urban Guildford that must be looked at and used first. Development in those areas would ensure that any new infrastructure required would benefit existing properties.

The Trust considers that all Green Belt development sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Trust makes further points on the Green Belt in dealing with the inclusion of the Former Wisley Airfield as a development site but, in summary, the Local Plan should commit more to uphold Green Belt boundaries and protections.

In the context of considering any alteration of Green Belt boundaries the Trust has had sight of a letter dated 7th June 2016 from Brandon Lewis the Minister of State for Housing and Planning to MPs which states “We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries”.

The site of the former Wisley Airfield

The Trust does in particular object to the inclusion in the draft Local Plan of Policy A35 relating to the site of the former Wisley Airfield and surrounding area and involving 2000 dwellings, and other building. It is said that the evidence for need for this is in the SHMA being used.

The size of the development that might be achieved at the site actually makes it unsustainable.

The Trust points to the South East Regional Plan not being revoked as to preventing new residential development close to the Thames Basin SPA, part of which lies just north of the site.
This is a much loved open area by those living in the south of Elmbridge that is Hatchford, Downside, Cobham and Stoke D’Abernon. The proposal for 2000 dwellings is not sustainable for many reasons. The site is in some beautiful countryside that would be devastated by the development. It is too close to the SPA and would result in the destruction of the Site of Nature Conservation Interest (SNCI). Proposals for this housing resulted in the unanimous refusal of application no.15/P/00012 which showed that it would have been delivered by apartment blocks up to 5 storeys, alien to the area and with a density higher than most London boroughs. Openness and important views would be marred from a number of directions including that from Painshill Park Landscape Gardens

The proposals for 2000 dwellings with other buildings, involving the introduction of some 5,000 new residents, are not sustainable for many reasons. To place them in context as to the increase in population, it would result in an increase of the equivalent of 50% of the population of nearby Cobham, having a significant adverse effect on the infrastructure of the southern part of the Borough of Elmbridge as well as the northern part of the Borough of Guildford. There would be significant wider effects on strategic infrastructure not only in Guildford but also Elmbridge, Mole Valley, Woking and further afield

A settlement here would create, on presently open country, a line of building that would start to merge settlements to become the urban sprawl that the Green Belt exists to prevent.

**Green Belt**

The site is entirely in the Green Belt. It was not contemplated for development for the existing Guildford Borough Council Local Plan 2003 or the South East Regional Plan. The Green Belt was established by and is protected by Acts of Parliament.

The starting point for consideration of taking any site out of the Green Belt is Paragraph 83 of the NPPF which confirmed that Green Belt boundaries can only be altered in exceptional circumstances through the preparation of the Local Plan. The only exceptional circumstance suggested in the draft Local Plan is the pressure to build more dwellings and that arises from flawed housing target figures. The proposed development would clearly impact negatively on the openness of the Green Belt and would be considered inappropriate development within the Green Belt under paragraph 87 of the NPPF. Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Under paragraph 89 those very special circumstances will not exist unless the potential harm to the Green Belt, is clearly outweighed by other considerations. The proposals for development at the site clearly fail at these hurdles.

There have been assurances by the government that unmet housing need, even if provable, is unlikely to outweigh the harm to the Green Belt and constitute exceptional circumstance (Ministerial Statement on the 17 January 2014 and letter from Brandon Lewis mentioned above).

There has been a tendency to portray this site as if it were a previously developed brownfield site (including emphasis on the remnant of the old runway) and it is worth noting that the runway and hardstanding are but a small part of the site. If the hard-core that is the runway were not to be removed for whatever reason such as viability, in due course, like the remains of many such sites in other parts of the country or the world, the runway would eventually disintegrate and return to agricultural land or nature, as was promised when it was requisitioned during the last world war. The vast majority of the site is good quality agricultural land recently advertised by the owners as Grade 3 and being arable land that has been farmed for many years.

**Wildlife**

The Trust is very concerned about protecting, and indeed expanding, Special Protection Areas (SPAs) and Sites of Special Scientific interest (SSSIs). The Trust supports the position of Natural England and the Campaign to Protect Rural England (CPRE) that studies show the need for the Green Belt to be protected as an integral component of England's ecological network and the additional views of the RSPB as to protection of biodiversity. While there may be scope for a developer to suggest Suitable Alternative Natural Green Spaces (SANGs) in an area, it is impractical to find any
sufficient such sites in the borough or adjoining boroughs that are not already protected in some way. Already
agricultural or wooded land should not be used as recreation land in order to justify building on other green spaces
nearby.

In the application no. 15/P/00012 the applicants sought to include an onsite SANG in supposed mitigation. That was
illogical as it would create an additional multi space car park and would only have increased visitor numbers to the
nearby SPA rather than draw them away.

The introduction of residences would mean the import into an ecologically sensitive area not only of humans, and
increase in their footfall, but also of pets. Studies of the effect of dogs and cats in particular have shown just what a
devastating effect this would have on wildlife. There is no answer to the effect of the introduction of humans and of pets
would have on wildlife and wildlife corridors and damage to habitats of the protected and endangered rare species in
contravention of the EU Birds Directives and Habitats Regulations.

Local Roads and transport

Looking at how the proposal to have a settlement of 2000 at the site would impact on transport, there would still need to
be reliance on vehicles for work and other needs and for delivery. It would be impossible to provide enough jobs for
residents in the area of the development which would result in a substantial increase of traffic on the local road network.
This suggested site for development is far removed from local stations and has no existing access to public transport. It is
unrealistic to assume that residents will not rely on the private car and reliance on private car or buses cannot meet
requirements for a low carbon, sustainable economy. It is impossible to provide safe walking and cycling routes to the
nearest station particularly in winter as the surrounding lanes are narrow and unlit. Further, public transport would itself
be limited by the weight restrictions imposed on surrounding roads which are narrow and unsuitable for Public Service
Vehicles.

In application no. 15/P/00012 the applicants incredibly suggested that stations are within easy cycle distance. Due to the
absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development
would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to
cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

Given how main roads (and in particular the M25 and A3) become jammed at various times, adding to the number of
motorists, development in this rural area would result in the use of more local roads as rat runs. The Trust would be
particularly concerned for the additional traffic on the very narrow and winding Ockham Lane and Plough Lane locally.

Cobham is the closest shopping centre to the proposed development. It already serves many from the areas of Ockham,
the Horsleys and Effingham with traffic along Horsley Road and Downside Road, Ockham Lane and Plough Lane.
Cobham is only 4.5 miles from the proposed development whether one used Old Lane, Horsley Road and Downside
Road or the A3 and the A245 - Guildford is by comparison 7.5 miles from the proposed development. The village could
not cope with the additional traffic and car parking involved in serving an additional 5,000 residents at the site and would
experience a significant increase in traffic from the development. Cobham would experience increased stationary traffic
at junctions. Traffic congestion has an impact on health and Cobham High Street is an Air Quality Management Area
arising in part from the proximity of the A3 and M25 and there are identifiable health problems already arising from this.
To add to the traffic here would exacerbate that.

One of the stations that in application no. 15/P/00012 the applicants claimed would adequately service the increased
population (much of which is likely to commute) is Cobham & Stoke D’Abernon (the local rail stations of Effingham and
Horsley could not cope). The route to that station is either by way of Downside Road or by way of the A3 and A245.
Additional pressure would be placed on parking at this station and overcrowding at peak hours would increase, quite
apart from the impact of vehicles using local roads for the purpose of getting there. In the refused planning application
there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north
at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

In that application the Trust supported Elmbridge Borough Council’s objections on the grounds that the development
would have a significant impact on the highway network.
There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic.

**Air quality**

There would be an increase of around 5,000 residents at the proposed development site with possibly an additional 4,000 vehicles. The air quality surrounding the site of the suggested development already causes concern, for instance levels of NO2 already exceed the EU limit due in part to the proximity of the M25, the A3 and Cobham Services on the M25. Additional traffic would worsen the situation, affecting the health of all current and future residents in the area.

**Summary of objections to this site**

Objection is supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

The only exceptional circumstance that might be advanced, with all other matters were discounted, is housing need. Insofar as that may rely on evidence tendered for that it does not bear any extensive examination and the government has anyway made it clear that housing need alone is not sufficient.

There would be a loss of Green Belt and countryside used for leisure purposes and an immense effect on biodiversity. The development would affect not only the surrounding natural land but add to the danger of losing rare species that need protection.

The land is close to the M25 and A3 junction and would increase the number of vehicles using these busy roads on a daily basis, cause further extensive use of inadequate local roads and cause further pollution. Surrey is very poorly served by public transport and any new residents would be reliant on private transport.

A new settlement here would absorb the hamlet of Ockham. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. There is no realistic account taken of general organic growth and other proposed developments and impact on traffic and infrastructure.

**Sites in East and West Horsley**

There is considerable concern locally that Effingham, the Horsleys, Ripley, Wisley and the Ockham and Hatchford areas are protected from unwarranted development. But the changes to settlements that would have most effect on the Cobham area in terms of increased traffic and call for amenities, if the draft Local Plan were implemented, would be the Horsleys. Implementing proposals for Sites A36-41 would destroy the nature of the villages that make up the Horsleys. The new building suggested for these villages is excessive and disproportionate relative to the rest of the borough. It has to be asked why it is suggested that the Green Belt is sacrificed here where the protection of the Metropolitan Green Belt is highly relevant when on the other side of the borough in the Ash and Tongham areas the draft Local Plan looks to expand the Green Belt.

The reclassification of East Horsely to a Rural District Centre would allow less desirable uses such as factory outlets, warehouses, clubs etc. to be the subject of applications for planning permission. Development in these villages should not be other than from small windfall sites.

**Housing Target**

Setting a housing target for Guildford Borough is a vital function for the Local Plan. The Trust is reluctant to get involved in the method of reaching a figure for an adjoining borough but, given what is at stake locally, considers that it has an obligation to comment and object to the figure put forward.
Paragraph 158 of the NPPF 158 provides that "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence". The starting point for that is a Strategic Housing Market Assessment (SHMA).

The SHMA does not take into account any of the constraints to development such as Green Belt, AONB, woodland, heathland, protection of flora and fauna etc. in determining an “Objectively Assessed Needs” (OAN) figure for the Local Plan. It is for the local authority to take these constraints into consideration and apply them to what is provided in the SHMA.

There has been nationwide concern, especially from local residents and community groups, even about the figures emerging from the SHMA process. In many instances the figures are considered to be inflated or otherwise inaccurate. Such inflation can occur in the hands of consultants who are inclined to favour developers. Guildford Borough Council have used G.L.Hearn as consultants and that company’s website shows that their work for developers could provide motive for bias. Local authorities can succumb to those in the planning industry acting on behalf of developers who advocate that the “presumption in favour of sustainable development” means that growth must be looked for across the board and in doing so have less regard to where there should be constraints. If local authorities overlook proper scrutiny it can also be because that development can generate income from Community Infrastructure Levy, taxes and bonuses.

For the purpose of a Local Plan it is necessary to have underlying data that is used to back up propositions. In the case of the West Surrey Housing Market Area (SHMA) for Guildford, Woking and Waverley, and prepared by G L Hearn, requests for that have met with resistance. Incredibly Guildford appear to have told the Information Commissioner that consultants have refused to give it the formulae and assumptions in the model because of ‘intellectual property’ in the model used. The Trust understands that in consequence neither the administrators nor councillors at Guildford Borough Council have had an opportunity of scrutinising vital basic information. This makes it all the more important that Inspectors test SHMAs and OANs against properly provided methodology.

The Trust understands that the process toward determining targets for future housing numbers starts with the Office for National Statistics (ONS) projection of the likely local population change for the borough due to natural change (births, deaths), net internal migration within the UK and finally net international migration.

The Trust understands that based on natural change and net internal migration recent ONS data projected that the borough population to 2031 would shrink and that it would increase only on projected net international migration based upon the abnormally high increase in the number of foreign students attending the University of Surrey (as was experienced in recent years). The ONS themselves state that this latter figure is less reliable and anyway stress that before its projections are turned into predictions their basic statistics should be reviewed in detail, with changes made based on whatever factors are deemed important in that review.

G L Hearn have assessed the housing need for Guildford at 693 dwellings per year, (13,860 overall) for the next 15 years (the result bring to add 25 per cent to the stock of dwellings in the borough with increased pressure on existing infrastructure. It is based predominantly on international migration, itself based on an increase in students. Even if desirable this is implausible particularly in a post-Referendum climate with further education being more expensive in the UK compared with other countries, evidence this week of students no longer wishing to study in the UK and a trend to distance learning. This issue should also be considered in the type of housing required. If based on any realistic forecast the University, with unused planning permissions for student accommodation on campus, should take responsibility to enable this factor to be removed from the equation for projected household numbers. This would free up affordable housing for local people, particularly the young. In any event, a separate detailed assessment should be made of the need for and type of student housing required.

This aspect of the SHMA reveals that the basis for it is severely flawed.

There is also a need in looking at housing targets to distinguish between need and demand. The latter could be limitless as in Guildford house prices and therefore demand are dictated and dominated by London house prices. The outward movement of population from metropolitan London is incapable of being satiated and was an important reason for the creation of the Green Belt.
In looking at the OAN there would appear to be insufficient evidence of the residences that Guildford town can accommodate (windfalls, reuse of empty housing, switch from office accommodation and use of student accommodation). A substantially lower number would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Additional observations

The Trust makes the following general observations on the draft Local Plan.

Policy S1 should go in full through the principles for sustainable development in the NPPF in full including the 12 Core Planning Principles set out in paragraph 17.

Evidence on infrastructure

The draft Local Plan seems to have again been assembled with insufficient proposals or research on the infrastructure needed to accompany proposals for housing development. There must be proper infrastructure planning for transport, educational, medical, energy, water and communications services before additional housing is contemplated. It does not seem to be understood that, for instance, bus transport is wanting and there are few facilities in the borough for any transport to rural parts except by car. There is no guarantee that the A3 will be improved in the way suggested.

Urban Development

The Trust supports higher density development in the urban area where there is existing infrastructure, although that should of course avoid over intensification. Guidelines should avoid spoiling the environment and causing congestion but much can embrace fresh thinking on urban life including pedestrianisation, cycling lanes, home zones and underground parking.

Affordable homes and homes for those on low income and the young

Market prices in the South-East mean that homes designated as affordable are just not that. That makes it even more important that developers are given no leeway from the requirements to provide a proportion of a development to be built as such. In this area there is no excuse to plead viability as a reason not to comply with guidelines. The Trust is keen that in the North Surrey area Local Plans should be formulated in a way that will provide accommodation for local people, to the young and those on low pay and that a good stock of starter homes and social housing are made available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/5201 | Respondent: | 8565217 | Cobham Conservation and Heritage Trust (David Bellchamber) |
| Agent: | | | | |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A35 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | | | | |
Looking at how the proposal to have a settlement of 2000 at the site would impact on transport, there would still need to be reliance on vehicles for work and other needs and for delivery. It would be impossible to provide enough jobs for residents in the area of the development which would result in a substantial increase of traffic on the local road network. This suggested site for development is far removed from local stations and has no existing access to public transport. It is unrealistic to assume that residents will not rely on the private car and reliance on private car or buses cannot meet requirements for a low carbon, sustainable economy. It is impossible to provide safe walking and cycling routes to the nearest station particularly in winter as the surrounding lanes are narrow and unlit. Further, public transport would itself be limited by the weight restrictions imposed on surrounding roads which are narrow and unsuitable for Public Service Vehicles.

In application no. 15/P/00012 the applicants incredibly suggested that stations are within easy cycle distance. Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

Given how main roads (and in particular the M25 and A3) become jammed at various times, adding to the number of motorists, development in this rural area would result in the use of more local roads as rat runs. The Trust would be particularly concerned for the additional traffic on the very narrow and winding Ockham Lane and Plough Lane locally.

Cobham is the closest shopping centre to the proposed development. It already serves many from the areas of Ockham, the Horsleys and Effingham with traffic along Horsley Road and Downside Road, Ockham Lane and Plough Lane. Cobham is only 4.5 miles from the proposed development whether one used Old Lane, Horsley Road and Downside Road or the A3 and the A245 - Guildford is by comparison 7.5 miles from the proposed development. The village could not cope with the additional traffic and car parking involved in serving an additional 5,000 residents at the site and would experience a significant increase in traffic from the development. Cobham would experience increased stationary traffic at junctions. Traffic congestion has an impact on health and Cobham High Street is an Air Quality Management Area arising in part from the proximity of the A3 and M25 and there are identifiable health problems already arising from this. To add to the traffic here would exacerbate that.

One of the stations that in application no. 15/P/00012 the applicants claimed would adequately service the increased population (much of which is likely to commute) is Cobham & Stoke D’Abernon (the local rail stations of Effingham and Horsley could not cope). The route to that station is either by way of Downside Road or by way of the A3 and A245. Additional pressure would be placed on parking at this station and overcrowding at peak hours would increase, quite apart from the impact of vehicles using local roads for the purpose of getting there. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

In that application the Trust supported Elmbridge Borough Council’s objections on the grounds that the development would have a significant impact on the highway network. There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic.

**Air quality**

There would be an increase of around 5,000 residents at the proposed development site with possibly an additional 4,000 vehicles. The air quality surrounding the site of the suggested development already causes concern, for instance levels of NO2 already exceed the EU limit due in part to the proximity of the M25, the A3 and Cobham Services on the M25. Additional traffic would worsen the situation, affecting the health of all current and future residents in the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I further object to the proposal for this development in the Horsleys and to the proposal to build 2000 houses, with shops and churches, at Ockham on the former Wisley Airfield because the infrastructure is insufficient to cope with these developments and there appears to be neither the scope, the money nor the plans to develop the necessary sewage removal and treatment, the schools, doctors’ surgeries, roads and car parking. Horsley roads are narrow, unlit, often without pavements, never more than one lane in each direction, and some roads are actually single track lanes with and without passing places. The foul water sewers are old and unmapped and will need considerable investment for improvement and enlargement to cope with the proposed scale of development. There is no provision for this investment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1628  Respondent: 8566145 / Mrs Diana Brighton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford Local Plan 2017 in particular to the plans to build on the Wisley Airfield and fields. The site is a valued part of the Green Belt and it is therefore not legally available for development.

In addition:

I consider the site is not suitable or sustainable as a residential area because it is dangerous to walk or cycle from the site to the local train station. This is due to the lack of street lights and pavements along this narrow road which is regularly used by large and heavy vehicles causing all other traffic to pull into the verge.

Proposals for new road access to the station for cars and for cycle paths will undermine the rural identity of the surrounding area which is characterised by its unlit, pavementless, narrow country roads through fields and small villages.

I understand that a bus service is proposed but the narrowness of the road and the lack of anywhere safe for passengers to catch or alight from the bus makes this an unrealistic proposition.

The site is adjacent to the A3 road which carries very heavy traffic. The air pollution level is already very high and will become even higher if this planning application is allowed. Inevitably the levels will be greater than the levels currently allowed and thus in breach of the law. The pollution will be increased even further if residents have to use their cars to reach the station where there is already insufficient parking.

Within the time frame proposed for development of this site the access for construction traffic will heavily impact the surrounding roads which are not suitable for sustained use by heavy vehicles and will cause unacceptable disruption to the lives of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A35, WISLEY AIRFIELD

Wisley Airfield has been vacant for decades. All the buildings associated with its previous function have been removed. The runway is not visible from beyond its boundaries. It is located some considerable distance from any meaningful settlement within the wholly inadequate infrastructure for a development of this scale and is served by narrow winding country roads with no footpaths. It is not served by public transport. It, therefore, constitutes a wholly unsustainable development in an unsustainable location. A recent outline planning application for its development was refused unanimously by the Council’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I endorse the submission by WAG

WAG commented in its 2016 representations that the over-allocation of housing meant that there was no justification for including the former Wisley

I endorse the submission by WAG

WAG commented in its 2016 representations that the over-allocation of housing meant that there was no justification for including the former Wisley Airfield (A35) given the harm it would cause. That case is strengthened by the reduction in the housing requirement.

There are issues concerning pollution levels due to its proximity to the M25 and A3 and proximity to SPA, and sustainability, none of which have been addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I strongly object the inclusion of site A35. It should be removed from the Local Plan for all the reasons that the recent unsuccessful planning application was rejected.

To name a few: proximity to the Thames Basin Special Protection Area, RHS at Wisley Gardens, and the already polluted gridlocked A3/M25.

I strongly object to the former Wisley airfield being removed from the Green Belt. I strongly support the Green Belt and feel that the large proposals within the local plan for building on the Green Belt is wrong.

I strongly object to the idea of an increase of 5,000 cars into the small rural country lanes of Ockham.

I strongly object to Allocation A35.

Just recently the council refused permission for numerous reasons, none of these have changed, SO WHY IS THIS SITE STILL IN THE LOCAL PLAN???

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4294  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site A35 Land at former Wisley Airfield Ockham

168. I object to this site being i It is a large open space in the Green Belt and there are no exceptional circumstances. The site has extensive views to the AONB. It is an SNCF next to an SSSI and the Thames Basin Heaths SPA. The recent planning application was turned down for many very good reasons that will not go away. There are serious and wide reaching traffic issues arising from the proposed development and these will impact on The Horsleys, Effingham, Cobham, Ripley, Send, the A3 and the M25 and further afield. The proposal is unsustainable and environmentally destructive.

169. With so many negative aspects, and grounds for rejection, the site should not have been included in the draft Local Plan and it appears that undue favour is being given to its developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3729  Respondent: 8574369 / Douglas French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Wisley Airfield, which is classified as a brownfield site on a spurious technicality when everybody can see that it is not what is understood by brownfield, being included in the Local Plan as a development site for 2000 houses when Guildford Planning Committee have just refused the planning application relating to it. Either the left hand does not know what the right hand is doing or this is a devious diversion. I object for all the reasons identified by GBC Planning Committee when it rejected the application.

I OBJECT to building 2000 houses at what GBC calls Wisley but is actually at Ockham, because it would massively and detrimentally overwhelm Ockham village, East and West Horsley and the entire neighbouring area. The proposal is ill conceived, showing scant regard for the Green Belt, infrastructure requirements, transport, or pollution and lacking nearly all the evidence that is needed to show that such a development would be sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7232  
Respondent: 8574881 / Melanie McLaren  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

  - I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3205  
Respondent: 8575617 / Effingham Parish Council (Ian Symes)  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

(A35) Wisley

Object

EPC objects to the approximately 2000 units proposed for the former Wisley Airfield. It is an over-development of the site and will adversely affect already heavily congested local roads and lead to much worse traffic congestion at the Forest Road, Effingham Common Road junction. Additionally, EPC is concerned about the usage of the car park at Effingham Junction station. This is already full, on most working days, with cars spilling out to park on Effingham Common Road, in contravention of highway regulations.

Many residents of Effingham commute to London to work. The extra pressure on rail services from the site allocation at Wisley will mean that Effingham residents may find there is only standing room on the Effingham Junction to Waterloo service during rush hours.
Effingham residents are also concerned about the inadequacies of the road infrastructure if Wisley were given planning permission. The route from the Forest Road, Effingham Common Road junction, via Old Lane, to the A3 is heavily used and any closure, or restriction, of this road during development of the site would have a severe effect on traffic through the area as well as causing great inconvenience and added pollution.

There are over 120 Effingham residents who live within the East Horsley settlement area and these residents will be particularly impacted by the increased traffic along Forest Road if Wisley were developed, especially in the morning rush hours when new Wisley residents would drive through the area to park at Horsley and Effingham Junction stations.

EPC has previously objected to the planning application at this site and maintains this objection.

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 fact that despite its earlier rejection, The Wisley Airfield site plan for 2000 homes is still in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8326  Respondent: 8581089 / Jenny Wicks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A35

I object to this policy. Again no evidence is out forward of exceptional circumstances to justify its removal from the Green Belt.

In fact, of all the sites proposed in the Plan, this is the one which most contributes to checking the outward sprawl of the London conurbation.

It is difficult to see how a sustainable development could be built here. Narrow, unlit, rural roads lie between the site and the nearest two railway stations (which have no spare parking capacity), so walking and cycling to public transport are extremely unlikely and the new settlement would be predominantly car dependent at the already over-trafficked junction of the A3 and M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7946  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This site has been turned down for development in the past three to six months.

It is difficult to follow the historic logic of this site as Surrey County Council want to use it as a waste ‘transfer site’ in their plan, whilst Guildford want housing, and the residents wish it to remain as is.

The pollution levels [CO2 NOx] at this site exceed acceptable levels for asthma sufferers. On health considerations (air pollution) and being so close to the overloaded M25 can, or should, this site be considered for residential use?
This Policy must be considered as unsustainable and unsound in respect of healthy residential use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6644  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? ( )

The proposal to build over 2000 new homes together with other facilities, particularly employment facilities, will have a huge impact on the area including East and West Horsley. It is not reasonable to expect local roads to be able to cope with the increased volume of traffic eg those driving from the development to Horsley Station and shops. Apart from the roads East Horsley Medical Centre is full, the Howard of Effingham Secondary school (the main school for the area) is oversubscribed while parking space is already under pressure in the East Horsley Station Parade area. Infrastructure is earmarked for the Wisley site but it is highly likely that new homes would be constructed before new infrastructure. In any event there would still be considerable pressure on the East Horsley area from this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4191  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 A35: Former Wisley Airfield, Ockham

The description of the Wisley site, which is in the Green Belt, has been changed from “Land at former Wisley airfield, Ockham” to ‘Former Wisley airfield, Ockham’. This is misleading. The airfield only takes up a small fraction of the site. Much of the site is agricultural.

Beginning with land at the former Wisley airfield there will be continuous development from the M25 along the A3 to Guildford. Prime reasons for the Green Belt are its openness and to prevent urban sprawl, and yet these reasons are being ignored in the Local Plan, even though the Green Belt is land which is given protection from development in the NPPF.

I object to the change in name of “Land at former Wisley airfield, Ockham” to “Former Wisley Airfield, Ockham”, for the above reasons.
I object to: Requirements: Infrastructure (3)(d) Mitigating Highways Performance Issues. This opens the way to damaging rural roads and lanes, and the character and landscape which they provide. The straightening and widening of such roads and lanes would leave this area bereft of countryside and village character.

As stated in my original submission to the 2016 Local Plan consultation, 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: pslp172/2782  Respondent: 8587937 / Mair L Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object most strongly to the development on the Former Wisley Airfield. The number of houses involved remains quite horrific. I have written to you several times now and nothing of any consequence seems to have been taken into consideration of in excess of 30,000 objections to last year’s plan. To think a [illegible word] will make any difference is laughable. Our area/station will be saturated. Worse still, you will be housing these new folks just off Junction 10 of the M25 which is already over the limit of contaminated air.

I appreciate the developers need to cram in as many houses as possible on the Airfield in order to make a turn on their investment, ie they probably paid too much for the site. But they do not live here! Surely such a plan that affects generations to come, as well as the current taxpayers, should not be held ransom to these developers. Green spaces surrounding our capital are precious. We all need areas for play and enjoyment, as indeed does the wildlife.

I do hope the Government’s Planning Inspector has some sensitivity towards democracy as opposed to a developer’s greed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7958  Respondent: 8589249 / WAAG (Mary Claire Travers)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)

Wisley Action Group (WAG) has reviewed the Proposed Submission Local Plan (Local Plan) and considers that:

1. Despite GBC’s protestations to the contrary, the Local Plan has failed in a number of key areas to take into account or to answer many valid comments and criticisms submitted by thousands of residents and organisations in respect of e.g. the 2013 Draft Local Plan.
2. The Local Plan prioritises growth to the detriment of the ongoing viability, character and “liveability” of Guildford town centre and neighbouring villages and the protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA.

3. The Local Plan allocates too much land for development, based on a flawed Strategic Housing Market Assessment, and an artificially inflated Housing Target not justified by actual or reasonably projected demand.

4. There are a number of inclusions in the Local Plan which, in WAG’s view, undermine the soundness of the Plan as a whole on grounds of lack of sustainability, deliverability and need.

5. The purpose of the Local Plan should be to enhance the quality of life of the Borough’s resident population, not to increase those aspects which cause the most dissatisfaction: traffic congestion and pollution are not eased by increasing the amount of traffic; inadequate infrastructure, whether schools, services, or sewerage, is made worse not better by increasing demand; and building houses, schools or other facilities in places furthest from existing areas where people live or work merely increases problems of inconvenience, travel, and development sprawl.

Against this background, WAG OBJECTS to the Local Plan overall on the following grounds:

1. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt.

2. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

3. The housing number of 693 houses per year from the Strategic Market Housing Assessment is based on flawed analysis and is too high. Guildford Residents Association (GRA) has commissioned an independent review of the SHMA, which concludes that the methodology used to arrive at the figure of 693 homes is flawed and that the FOAN for Guildford District is in fact 510 homes a year over the plan period.

4. New houses, schools and services should be developed in or adjacent to areas of actual demand and not in relatively remote areas which inevitably and unnecessarily result in major increases in travel requirements from home to work, work to home, home to school, etc.

5. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

6. The continued inclusion in the Local Plan of the former Wisley airfield (which is located in Ockham and which is known locally as Three Farms Meadows) is perverse and illogical, and is unsound for reasons of sustainability, deliverability and need.

Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), WAG considers that the inclusion of the site in the Local Plan renders it unsound and the plan should be modified to exclude it. These objections have been made consistently by WAG and others in relation to, inter alia, the GBC’s 2013 draft Local Plan and Planning Applications for development or use of FWA/TFM:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.

2. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of a new settlement of over 2000 dwellings at FWA/TFM was decisively and unanimously rejected by GBC on 8 April 2016, after 15 months’ consideration by the Council, including extensive consultation and several major amendments, following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many, including that the proposed development:

- was an inappropriate development within the Green Belt;
- would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;
- failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;
- failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
• was within the 0 - 400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
• would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;
• failed to deliver the required transport sustainability measures;
• failed to secure an appropriate provision of affordable housing;
• was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
• would result in loss of the safeguarded waste site;
• presented a dense and urban form of development owing to its quantum and scale;
• had an adverse impact on the setting and significance of a designated heritage asset;
• had an unacceptable air quality impact;
• impacted on education infrastructure;
• impacted on policing infrastructure;
• impacted on health infrastructure;
• impacted on library provision.

1. Both these and other serious objections and concerns had been raised by WAG, neighbouring borough and parish councils, Surrey County Council, statutory bodies, CPRE, Surrey Wildlife Trust, University of Surrey, Thames Water, NATS, the Environment Agency, Police Authorities, Highways Authorities, residents’ associations and several thousands of other organisations and individuals - both in the context of the planning application and in relation to the current and earlier GBC draft Local Plans.

The numerous concerns raised by WAG and others have been well documented in previous correspondence from WAG to GBC (copies of these representations attached). These concerns are supported by a series of legal opinions from Leading Counsel (appended for convenience), most recently the opinion of Richard Harwood QC, dated 17th May 2016, which advises that the FWA/TFM allocation is highly likely to be found unsound by the Inspector at the Local Plan examination. They are founded on the following:

1. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt.
2. The very serious harm to the openness of the Green Belt which would be caused by a development of this scale in this location, as acknowledged by the Council in refusing permission for the recent application. As was also acknowledged by the Council, unless the exceptional circumstances test is made out there is not even scope for redeveloping the previously developed parts of the site – the runway, the taxiways and aircraft hardstanding – because of the serious harm which would be caused to openness and to the Green Belt purposes.
3. The absence of any exceptional circumstances justifying removal of the site from the Green Belt. The only justification for releasing the site is said to be the shortfall in available sites to meet the housing needs of the Borough. However the Council’s own evidence base demonstrates that the release of this site is not, in fact, required in order to meet the housing need. Thus:

   1. Draft policy S2 states that 13,860 new dwellings will be provided over the Plan period in order to meet the identified housing need, based on a FOAN of 693 dpa (693 x 20 years = 13,860).
   2. However the LAA advises that, not including sites with planning permission, sufficient land is already available to construct 13,708 new dwellings over the next 15 years i.e. up to 2031 (with any development from 2031-2033 to be added to this total).
   3. There are 1,342 homes with planning permission which are expected to deliver new homes within the next five years, as well as 66 homes in the 11-15 year period.
   4. Accordingly, there is already provision for a total of 15,116 new homes, even without taking into account completions for 2013-2014 (132), 2014-2015 (242) and 2015-Feb 2016.

Even on the Council’s own analysis, there is therefore a significant surplus of available land compared to the identified housing need, and this surplus has previously been acknowledged by the Leader of the Council. Consequently, the housing need cannot amount to exceptional circumstances justifying the release of this site. Moreover, as noted above, the expert advice received by WAG is that the FOAN of 693 dpa is far too high and that the correct figure is in fact 510 dpa, or 10,200 dwellings over the plan period. On this analysis the available land far exceeds the identified housing need.
1. The Sustainability Appraisal includes the FWA/TFM allocation only if the Plan proposes OAN plus 14% (page 32). Consequently FWA/TFM is not required to meet the Council’s own needs figure. The presumption in favour of sustainable development in para 14 of the NPPF does not support the FWA/TFM allocation – as policy is simply to meet OAN with sufficient flexibility to adapt to rapid change unless specific policies, including Green Belt, indicate development should be restricted. Paragraph 47 of the NPPF requires Local Plans to meet OAN (unless there are constraints). The policy does not include a buffer in the Local Plan figure (the 5 year Housing Land Supply is distinct from the Local Plan total numbers). In the absence of national policy support for a buffer in the total, there is no case whatsoever for the allocation of FWA/TFM. There are no potential exceptional circumstances which could therefore support the allocation.

2. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath Special Protection Area, a SNCI and a SSI.

3. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the health risks associated with increasing pollution and decreasing air quality, as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding area.

4. The wealth of evidence demonstrating that the adverse consequences of development of the site, including damage to the ecology of e.g. the SPA, cannot be satisfactorily mitigated. This is also self-evident from WPIL’s failure to overcome these adverse impacts, despite considerable efforts over a period of 15 months.

5. The significant harm to the character of the surrounding area which would inevitably be caused by a development of up to 2100 dwellings in this location, necessitating building heights of up to five storeys and creating a wholly incongruous urban form of development in the middle of the countryside.

6. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.

7. The unacceptable impact of a development of this scale on Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, a Conservation Area and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased by more than 15 times.

8. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of Ockham’s population, as evidenced in the existing Ockham Parish Plan.

9. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road safety, with increased vehicle movements (an estimated 4000 additional cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity, and on local services and infrastructure. It is by no means clear how or whether - the mitigation schemes referred to in policy A35 can be delivered in order to overcome the severe impact of a development of this scale at FWA/TFM on the strategic or local road network (and, certainly, WPIL was unable to overcome these issues, despite considerable efforts on its part and on the part of the relevant authorities).

10. The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which at least 45.4ha is classified as best and most versatile land – Grade 2 and Grade 3a). As advised by the planning officer, a development of this scale would result in the loss of approximately 20ha of best and most versatile agricultural land.

11. The loss of a rare consented waste site in the County, which will increase pressure for waste sites elsewhere in the Borough.

12. The impossibility in practical terms of creating a sustainable development on FWA/TFM, which is further demonstrated by the limited historical use of, or development of, the site, and most recently by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development plan despite numerous attempts over an extended period.

13. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and the Horsleys.

Consequently the allocation is unsound under paragraph 182 of the NPPF in that:

- It is not positively prepared, since the allocation is not part of meeting objectively assessed requirements nor is it consistent with achieving sustainable development;
- It is not justified, failing to be ‘a most appropriate strategy’ (applying the LPEG change from ‘the most appropriate strategy’) since it contravenes numerous policies and alternative strategies can meet the needs in a less harmful manner;
• The allocation is not effective. The FWA/TFM site is not deliverable, as the objections from the highway authorities show. If the site was deliverable then certain reasons for refusal would have been overcome – the developer’s failure to do so despite a long application process indicates that these are insoluble. It is not based on effective joint working, the planning application being subject to objections from the county planning authority, two neighbouring district authorities and the local and strategic highways authorities;

• The proposal is not consistent with national policy and does not enable the delivery of sustainable development. Instead it is an isolated Green Belt site in an unsustainable location which causes harm to the countryside, landscape, agricultural land, natural conservation, highways, air quality and the historic environment.

CONCLUSION

These objections demonstrate conclusively why removal of FWA/TFM from the Green Belt cannot be justified, and why its isolated location, size, distance from places of employment, and lack of infrastructure, including overstretched and inadequate public transport, roads, services and facilities, make the site totally unsuitable for any kind of significant development – as WAG and others have consistently argued.

The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and previous findings, and ignores widespread expert and local opinion.

The repeated attempts, in numerous guises, over the last 3 years to take FWA/TFM out of the Green Belt and to press for both major and ancillary development of the site have stretched the patience and goodwill of local communities, not least Ockham Parish; have imposed heavy and unwarranted costs and other burdens on those local communities (who bear the costs twice: once directly and then again through their Council Tax contributions to GBC), have caused a blight on the area, distress to local residents and farming businesses, and have adversely prejudiced peoples’ lives and livelihoods.

WAG therefore strongly OBJECTS to this further and unwarranted attempt to exclude FWA/TFM from the Green Belt and thereby to promote a highly unsustainable, unnecessary and ultimately undeliverable development. It invites the Council to withdraw the deposit draft and re-deposit a version without the FWA/TFM allocation or to ask the Local Plan Inspector to modify the Plan by removing the allocation. If not, the Inspector is asked to find the plan unsound and if the Council request modifications, to recommend the removal of the allocation.

<additional documents attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Wisley Local Plan adv 170516 final.pdf (187 KB)
- Local Plan Strategy and Sites Consultation Response Covering Letter.pdf (201 KB)
- Tyler Grange Landscape and Visual Implications Report Sept 2014.pdf (5.1 MB)
- Former Wisley Airfield Advice 17 06 14.pdf (275 KB)
- Former Wisley Airfield Advice 17 06 14.pdf (275 KB)
- WAG Response to GBC Local Plan consultation 19 Sept 2014 Final.pdf (1.8 MB)
- BCP2 Letter from Nick Boles MP.pdf (2.2 MB)
- Wisley Local Plan lt to councillors 0416.docx (16 KB)
- WAG additional comments on flood risk.pdf (194 KB)

Comment ID: PSLPS16/6904   Respondent: 8589953 / Michael R. Murphy   Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Wisley Airfield, which is classified as a brownfield site on a spurious technicality when everybody can see that it is not what is understood by brownfield, being included in the Local Plan as a development site for 2000 houses when Guildford Planning Committee have just refused the planning application relating to it. Either the left hand does not know what the right hand is doing or this is a devious diversion. I object for all the reasons identified by GBC Planning Committee when it rejected the application.

I OBJECT to building 2000 houses at what GBC calls Wisley but is actually at Ockham, because it would massively and detrimentally overwhelm Ockham village, East and West Horsley and the entire neighbouring area. The proposal is ill conceived, showing scant regard for the Green Belt, infrastructure requirements, transport, or pollution and lacking nearly all the evidence that is needed to show that such a development would be sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2967  Respondent: 8590753 / Mr Michael Anning  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8285  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Within BOA TBH06 Wisley, Ockham & Walton Heaths; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Heathland, Acid grassland, Wet woodland, Arable field margins). Thames Basin Heaths SPA/Ockham & Wisley Commons SSSI is adjacent. Wisley Airfield SNCI is significantly impacted; Elm Corner Woodlands SNCI is adjacent. The Trust objects to the scale of development currently allocated for this site, as impacts on sensitive biodiversity interests are unavoidable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/580  **Respondent:** 8591169 / Michael Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

w. Site Objection (A35) Three Farms Meadows (TFM) – former Wisley Airfield. I object to this site being removed from the Green Belt. The site was comprehensively rejected for housing by GBC’s Planning Committee earlier in 2016 and for a raft of very good reasons. Nothing has changed to justify the inclusion of TFM for housing development. Specifically TFM should be excluded because:

1. It is unsustainable and reliant on private cars
2. Unsustainable because of poor air quality on both housing and the SPA
3. Impact on the Surrey Hills AONB
4. Urban nature – a townscape/cityscape rather than a rural design
5. No infrastructure for the site
6. No promised funding from central government/SCC for required infrastructure
7. Impact of NOx and other carcinogens on the potential residents and on the SPA
8. No consideration of the cumulative impact of the many other developments locally and on the expansion Plans of RHS at Wisley
9. Failure to consider protection of /impact on the historic properties within Ockham and the Chatley Heath Semaphore Tower

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6645  **Respondent:** 8591169 / Michael Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7077  **Respondent:** 8591169 / Michael Bruton  **Agent:**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I wish to make a supplementary submission regarding the proposed GBC Local Plan as follows:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels (and in breach of the Air Quality Directive) Additional traffic will exacerbate this situation, impacting the health of all current and future...
residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I request that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8314 Respondent: 8591169 / Michael Bruton Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

[re Policy A35]

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4476  **Respondent:** 8594177 / Michael Conoley Associates (Michael Conoley)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
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6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 1.JPG (125 KB)
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/795</th>
<th>Respondent: 8597761 / Mrs Pippa Fleming</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the Infrastructure deficit that will result and the impact on views to and from the Surrey Hills.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPS16/2458</th>
<th>Respondent: 8597825 / Mr P J Colborne-Baber</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>For Wisley why not consider a lovely country side park, a place where people could come to play games have picnics, enjoy nature. It could be linked to the R.H.S. over the A3 perhaps; with more consideration from those with such experience, I would have thought it would be a great solution.</td>
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<th>Comment ID: pslp172/2461</th>
<th>Respondent: 8599201 / Richard D Jarvis</th>
<th>Agent:</th>
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<td>The addition of point (4) under Requirements is supported.</td>
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<th>Comment ID: pslp172/2475</th>
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The addition of point (4) under Requirements is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/880  Respondent: 8601121 / Roger Collett  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)  
This seems a sensible way to attempt to meet the necessary housing target  
What changes (2016)/further amendments (2017) do you suggest should be made to the document? 
Attached documents:

Comment ID: PSLPS16/7027  Respondent: 8601601 / Mr Roy Dyer  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()  
We object to the removal of the Green Belt land at Wisley Airfield.  
We understand that Guildford Borough Council has rejected this scheme as being unsuitable, but it is still in the draft plan. This scheme must be removed from the final plan. In addition to the fact that this scheme involves the building of 2,000 homes on Green Belt land, there are no plans for road improvements and inadequate services.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document? 
Attached documents:

Comment ID: PSLPS16/3551  Respondent: 8605921 / Roger Lindsay  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()
Finally I object to the revival of the Wisley private plan. The dependence of the GBC plan on that dubious plan already thrown out and the lack of openness in the dealings of GBC with the developers is specially objectionable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7928  **Respondent:** 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

CPRE OBJECTION TO SITE POLICY A35 : LAND AT FORMER WISLEY AIRFIELD

CPRE objects to the continued inclusion in the draft Local Plan of the Former Wisley Airfield (FWA) now known as the Three Farms Meadows (TFM). This development was rejected unanimously on 8th April 2016 by the GBC Planning Committee when it was submitted as a planning application prior to the draft Local Plan being published. This decision was recommended by GBC Planning Officers. We can see no justifiable grounds for this development to now be reintroduced. The arguments for its refusal as a planning application are still as valid as before. Our objection to the former Wisley Airfield development reflects exactly our overall opposition to the draft Local Plan in which over 70% of new housing is to be built within the Green Belt. The GBC proposal conflicts with promises made to the electorate in this context. In our view there is ample brownfield land available in the urban area which should be used for housing instead of attention being concentrated on unsustainable sites in countryside outside the town. No exceptional circumstances have been established to warrant removing land from the Metropolitan Green Belt, which is characterised by its openness and permanence, to permit urban sprawl to spread onto agricultural land in attractive countryside.

We object in particular to the disproportionate allocation of housing to Green Belt land in this segment of the borough. Over 23% of the draft Local Plan’s new housing is supposed to be provided in the immediate vicinity of Ockham, Ripley, Send and the Horsleys, and of this total 65% is allocated to the former Wisley airfield.

CPRE objects to the way in which the draft Local Plan for this site will overwhelm the historic rural village of Ockham nearby - which has only 159 residential houses - and destroy its attractive character and identity that depends on its many listed properties, an absence of street lighting, and very few pavements. This charming small community which can only be accessed by narrow sinuous lanes will be sacrificed to the proposed new development in its immediate vicinity of more than 2,000 houses with high density urban buildings of up to five storeys in height spread out in an urban sprawl of unattractive new construction in open agricultural countryside.

We object to the statement that the new development will result in a significant shift to cycling and walking as a means of conveyance. It is incorrect to suggest that such an isolated built-up location would reduce reliance on private cars as a means of transport to Guildford and neighbouring villages and railway stations. A proposed development of 2,068 homes will result in an estimated 4,000 additional cars on the roads. The added congestion that this will cause on the narrow
country lanes in Ockham and surrounding areas will be a source of increased safety hazard to any cyclists and walkers. This will be made worse by the likely increase in bus and HGV movements from the new location with its additional school traffic. No footpaths or cycle lanes are present along these rural roads.

We object to any increase as a result of the proposed new development to the already severe congestion on the A3 and M25 which will require significant infrastructure enhancements. Work in this context to the A3 South of the site is not expected to be begun until 2019 at the earliest.

We also object to the way in which concern about the harm caused by traffic on the A3 and M25 to Air Quality has been treated with insufficient attention. Air pollution is already known to be a problem in many parts of the borough which needs to be tackled. We understand that for example the A3/M25 junction exceeds EU permitted levels and is comparable to air pollution in Oxford Street in Central London where only diesel traffic is present. The additional congestion that will be generated by the new development and by the proposed expansion of daily visitor attendance at the Royal Horticultural Gardens will only make this problem worse. The relevant authorities are well aware of the adverse impact on the health of local residents and plant life that increased traffic causes in terms of air pollution and will need to give this more urgent priority.

We object to the lack of consideration given to the environmental and ecological value of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and a Site of Nature Conservation Interest (SNCI) which will all be harmed. Traffic noise disturbance has been shown to have a negative impact on bird life which is of particular concern with regard to the SPA.

CPRE notes that concern has been expressed by a wide range of authoritative organisations about this development including Highways England, Thames Water, NATS and the Environment Agency.

The Minister of State has made it clear in a recent statement that housing need and/or demand is not sufficient grounds for encroaching onto open Green Belt countryside and that it is up to “local people” to express their objection to development of this kind. The proposed Local Plan does not meet the needs and desires of local communities. The two top responses in the Ockham Parish Plan call for:

1. Access to the countryside and clean air
2. The peace and quiet of wide open spaces

Over 90% of the local people in this community wish to see both the village’s historic features maintained and the former Wisley Airfield now known as the Three Farms Meadows protected.

CPRE agrees with them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPS16/7752</th>
<th>Respondent: 8607457 / Tom Stevens</th>
<th>Agent:</th>
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<td>I am writing to object to the proposed development on Blackwell Farm. I support the joint submission by Save Hog's Back and CPRE Surrey opposing the scheme as well as the document submitted by Karen Stevens as her personal response. Furthermore I also request that you consider all previous responses by Save Hog's Back to previous stages of the consultation as these remain valid to the scheme being proposed today.</td>
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<td>In particular I draw your attention to the brochure document produced by Save Hog's Back and the separate commentary on the Green Belt and Countryside Study titles &quot;Blackwell Farm - The Purpose of Green Belt&quot;</td>
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<th>Comment ID: PSLPS16/1015</th>
<th>Respondent: 8608865 / WBDRA. (David Bird)</th>
<th>Agent:</th>
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<td>WBDRA SUPPORTS this policy. It is a good use of otherwise disused/unused brownfield land and will provide a substantial number of new homes for the Borough.</td>
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<th>Comment ID: pslp172/2332</th>
<th>Respondent: 8609217 / West Clandon Parish Council (John Stone)</th>
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The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction to relieve the impact of this development on Ripley do get built, traffic on the A247 will increase dramatically.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Policy A35 Wisley

We object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.
2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
10. Cost of infrastructure required to the detriment of alternative more favourable sites.
11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.

13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am of the opinion that new houses are required but that they should be placed in locations where there is adequate supporting infrastructure in place in advance and where impact studies on existing populations are carried out first. I believe that development at Wisley is a viable option but only with road infrastructure improvements at the A3 carried out first, road improvements to Horsley station, as well as the station itself, being described and funding secured first and for healthcare and school provision being described and secured first. Descriptions of infrastructure already in place does not support the case for an increase in population which existing infrastructure does not cater for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to object most strongly to the inclusion of the Wisley Airfield in the local plan. We must protect our green belt and exclude this site from the draft local plan without delay. I have written previously to object, our country lanes cannot hold the considerable amount of traffic that would need to be accommodated, the A3 junctions would be even more clogged up than usual at rush hour, air pollution would suffer, the site is unsuitable for a housing development and would spoil the green belt and the protected area and its environs. The potential schools are not needed here. We are served by excellent schools already. This is the wrong area to consider. There are many other sites that could and indeed should be considered. Please start afresh. Take a step back and consider how detrimental this would be to our landscape. Why build on this agricultural land which should be retained as such, as was the original historical intention. There are sites off the M25 that could be considered, and outside Guildford, where much of the housing could be contained.

Please consider carefully all the objections you will receive from residents of this picturesque hamlet of Ockham - don't spoil our countryside in this way. Expand elsewhere but not her at Wisley - green open space enjoyed by so many is becoming a rarity. Conserve and preserve our green belt as was intended.

Attached documents:

Comment ID: PSLPS16/549  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Shortly before this Local Plan was published Guildford Borough Council totally rejected the application to redevelop Wisley Airfield, yet here it is again. The current proposal would destroy the village of Ockham. In effect the proposal is for a New Town with houses and blocks of flats packed close together on a density scale more appropriate to an inner London borough and the site is largely Green Belt.

I OBJECT to the intense use of this largely Green Belt land for housing units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslpl72/1516  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The idea of a new township on Wisley Airfield was, and continues to be a very bad idea. GBC has already objected to a planning application for the Wisley site and presented fourteen reasons to justify its position, yet keeps it in the Local Plan as a “policy site”!

The developers have presented what they call “minor” alterations to the original plan – I would query the use of the word “minor”.

I still **OBJECT** to the continued inclusion of the Wisley Airfield site in the revised 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:** pslp172/3583  **Respondent:** 8686913 / John and Susan Burge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I refer to the draft local plan.

I object to the inclusion of policy A35, Three Farms Meadow for the reasons below:-

1. The much heralded bus service from the site to Horsley would be a major hazard to other road users as the lanes are not wide enough. I object to the scheme because it is both unsuitable and dangerous.
2. There would be minimal employment on site so almost all residents would have to travel to work by road. I object to the inevitable increase in traffic and fear for the lives of those who chose to cycle on narrow unlit country lanes.
3. The site would generate increased traffic at the A3/M25 junction which is already heavily congested. I object to the further overloading on this road system and the resulting additional pollution.
4. I object to further "grabbing" of green belt land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/480  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

3. Three Farms Meadow site

I **OBJECT** also to the re-inclusion in the plan of **Policy A35** (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.
This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.18

Policy A35 should be ditched from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottlenecks and Ripley village and roundabouts.

1. **Application reference 15/P/00012.**
2. **Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).**

- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19

- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

*****

1. **The River Mole would flood even more badly should a new runway be built at Gatwick.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD): • Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. • Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application). • Unacceptable Conservative Party links between the developers and the Council. • No Green Belt “exceptional circumstances” presented. • Not a brownfield site as stated – only 15% of it. • Proposed SCC waste site ignored. • Loss of farming land. • Too near RHS Wisley and Thames Basin Heath SPA. • SANG would harm on SPA. • Will aggravate traffic jams at A3 roundabout and M25 Junction 10. • Unacceptable increase in air pollution. • No existing public transport and stations miles away. • No proper traffic data. • Housing density far too great. • Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings. • Access confined to inadequate narrow lanes. • Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole. • Major impact on neighbouring villages, especially Horsleys. • No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford BC proposed local plan (June 2016) and the continued inclusion in the plan of Three Farms Meadows (formerly Wisley Airfield) Allocation A35 phased development of new settlement of up to 2100 dwellings.

1 The site is in the Green Belt and the exceptional circumstances necessary for its removal have not been demonstrated.

2 The proposed development is too large scale and high density completely out of keeping with the surrounding area and swamping the village of Ockham.

3 There will be a very large increase in traffic around the site both during and after construction. Local roads are already congested and will struggle to cope with the new traffic volumes.

4 Air quality will also suffer as a result of the large increase in road traffic.

5 Parking is already inadequate at both of the local railway stations.

6 Schools and medical services in the area are already fully stretched and in view of this development and those proposed on the Horsleys, will need to be substantially expanded. Will the developers be meeting the cost of this?

7 The sewerage system in the area is already overloaded and would need to be greatly expanded to cope with the very large increase in housing.

8 Likely to be a greater risk of flooding on and around the development site.

9 Loss of rural environment and local footpaths and bridle ways.

10 The planning application has already been unanimously rejected by Guildford BC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1522  Respondent: 8704417 / Philip Ashfield  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield now known as Three Farm Meadows-Allocation A35 - the phased development of a new settlement of up to 2100 dwellings.

I very strongly object to the draft local plan for many reasons - and I wonder if any of the Councillors have really considered this proposal, and many others in the neighbourhood - Over 600 houses in Horsleys, 400 in Burnt Common, 2000 houses on Gosden Hill Farm (Burpham) plus a number of smaller sites in nearby villages. These add up to in excess of 5000 new dwellings in this neighbourhood.

As far as I am aware no Councillor or Planning Officer has ever been to or considered the enormous effect that this would have, not only on the residents in these areas but many other people from far and wide. I wonder if the Councillors or Planning Officers even know where these places are and, possibly as they do not live near the area affected, they feel that they are correct in putting these plans forward (NIM BY/SM).

If these building projects were carried out then there would be total traffic gridlock not only in the local area but on the M25 and A3 and, of course on every one of the smaller roads in Surrey and the surrounding Counties.
Amongst my other objections to the draft local plan, where no consideration has been given, are:

- There are not sufficient Transport links (railways, buses or roads)
- There are not sufficient Schools/Academies to educate possibly up to 10,000 children in the area. There are insufficient shopping and parking facilities
- The roads in the area cannot take any increase in traffic as this contribute to grave danger to all users (car drivers, pedestrians and cyclists, etc)
- The air pollution is already at a high level and any increase caused would be well in excess of the legal level.
- I was under the impression that the Councillors had previously stated in their Manifesto that "the Green belt is safe" It now appears that these words were totally meaningless and untrustworthy.
- Councillors and planning officials have no right nor lawful reason to turn prime Greenfield land into an enormous urban sprawl/slum stretching from Greater London to Guildford and probably further out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1879  Respondent: 8704417 / Philip Ashfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield now known as Three Farm Meadows- Allocation A35 – for the phased development of a new settlement of up to 2100 dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1675  Respondent: 8706561 / Carolyn Pritchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Once again I write to OBJECT strongly to this new development.

The reasons are always the same ie this area CANNOT COPE with such a mass expansion of new homes. The effect on the environment, lighting, our terrible poor quality roads, Doctors, countryside, drains and flooding, travel etc.

Even considering Traveller pitches and sheltered/care homes is unthinkable. If allowed then the 2000 new homes will never be sold!

I have lived here nearly 60 years, from a child, and I do not like what you are submitting. This is a lovely area and already over populated.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>PSLPS16/5684</td>
<td>8708289 / Frances King</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td><strong>Site A35 - Former Wisley Airfield: I OBJECT</strong> to the inclusion of the former Wisley Airfield as a site for 2,000 home. This is totally inappropriate development that requires the land to be taken out of the Green Belt to even suggest that it should be built on. No exceptional circumstances have been given to justify such a move. Guildford Borough Council is being hypocritical in its inclusion in a Proposed Local Plan published the day before a planning meeting that gave very strong reasons, it being in the Green Belt and the traffic management next door to the already excessively busy Junction 10 of the M25 where the A3 joins that road for refusing an application to build 2,068 houses on the site. If there were no exceptional circumstances to justify planning permission the day after the Local Plan was published how can there be the day before! The information about the amount of brownfield land at the site is incorrect.</td>
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<td>PSLPS16/4352</td>
<td>8711489 / Malcolm Wyche</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>The Wisley Site - Possible site for future expansion but who would trust the company for the project? Basis is an off shore tax haven that’s enough to convince me they have little or no interest in surrey’s well being. Their sole objective will be to get the maximum cash return from the project. Money is their motivation – not concerns with developing a site that is – keeping its location eg. opposite the royal horticultural garden at Wisley. Finally does the site have the necessary infrastructure to support further development. The simple answer to that is NO, it does not, so why produce a plan that will only jeopardise what we need to hang on to.</td>
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<td>PSLPS16/2199</td>
<td>8711841 / Rosmarie Roberts-Kunz</td>
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I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/116  **Respondent:** 8713889 / Joyce Campbell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Furthermore, it is beyond comprehension that the development of the Wisley Airfield site to include 2000 houses, has been included again after having been overwhelmingly rejected so recently.

What is the point of having public consultation when its findings are completely ignored?

I sincerely trust that the plan as it exists will be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/7709  **Respondent:** 8717921 / Helen Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 to the fact that the impact of poor air quality on the Special Protection Area is not properly taken into account. There is no evidence that the impact of nitrogen and acid deposition on the heathland and the consequent degradation of the heathland has been taken into Please see the attached document by Baker Consultants specifically in response to the planning application almost identical to policy A35 which is relevant for ALL SITES WHICH ARE CLOSE TO THE SPA.

- I object to the allocation Three Farms Meadows– allocation A35.I object to the proposed removal of this site from the green belt when no exceptional, very special or special circumstances I object due to
  1. Unsustainable nature of site reliant on private cars and undeliverable public transport [in terms of unrealistic journey times/fabricated modelling which do not stand up to scrutiny]
  2. Unrealistic assumptions that people will even walk from one end of the development to the other to go to the doctor, school, shop etc.
  3. Unsustainable due to poor air quality impact on both housing and the SPA
  4. Impact on views to and from the Surrey Hills AONB
  5. The urban nature of the proposal – five storey buildings are out of keeping in the countryside [and some would argue are not even acceptable in Guildford town centre]
  6. Road, sewerage, fresh water, gas and electric capacity does not exist
  7. Funding for infrastructure from Central government does not exist;
  8. There is already a huge infrastructure deficit in terms of This is not properly taken into account.
  9. Impact on nitrogen deposition on the TBHSPA is not neutral and this allocation is therefore open to legal challenge
  10. No consideration has been taken of the current and future plans of the RHS These should take priority over allocation A35. Roads definitely cannot accommodate an additional 500,000 visitors to the RHS and 5,000 residents of site A35. [this is without taking into consideration the huge number of houses planned in the Horsleys, Send and Ripley].
  11. Robust objections to the planning application almost identical to this allocation were made by numerous statutory bodies including neighbouring Local authorities
  12. Insufficient consideration has been taken of the historic houses in Ockham and Ripley and the Chatley Heath Semaphore Tower

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Baker Consultants review of ecology documentation.pdf (1.0 MB)

Comment ID: pslp172/3957  Respondent: 8717921 / Helen Jefferies  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:
1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

12. Opportunity (3) should be common to all sites and is not unique to this site

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

16. I object to the removal of additional 3.1 ha from the green belt without any justification

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

36. I object to the plan period being inconsistent. This is an example (of which there are many) of extremely sloppy work which gives me no confidence in the content. For example, the foreword mentions an end date of 2034 whereas the introduction 1.2 and 1.3 refer to 2033. Spatial vision uses 2033. What is the plan period? This is very unclear.

37. 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.

38. Para 2.13 I reject the statement that most local roads in villages have “at least one footway and usually two“.

39. I reject the assumption in para 2.15 that increased road infrastructure capacity – it may improve theoretical capacity but actually worsens performance.
40. I object to the new green belt provision in Ash and Tongham to prevent the merger with Ash Green and I do not understand why this locality should be treated any differently from any other location for example the merger of Ripley and Ockham as a result of policy A35.

41. I object to the fact that the spatial vision makes no mention of protecting the TBHSPA

42. I reject the comment in the spatial strategy that the RIS will provide congestion relief for the A3 in Guildford as my understanding is that these schemes have been dropped.

43. I do not accept para 3.2 where there is a disconnect in the period of the Council’s Corporate Plan and the Submission plan –

44. I object to Para 4.1.11 which should clearly identify the version of the LAA and not just refer to “the latest”.

45. I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

46. I object to the wording of 4.2.18 which is unenforceable. Throughout the plan the word “Expect” needs to be replaced by “require”

47. Likewise, I object to the use of the word “resist” in 4.2.24 – it should be replaced by “refused” in this para and throughout the plan.

48. I object to the wording of policy H2 specifically “we will also seek” and “we will seek”. This should be replaced by the use of the verb “require” in this para and throughout the document.

49. Policy H2 para 4 needs to include that any funds paid in lieu of affordable housing should be ringfenced and the wording further tightened by replacement of “expect” by “will enable”

50. I object to policy H3 para b “the local community”. Rural exception sites should only be allowed where the identified need is truly local defined as within the parish.

51. I object to policy P2 and the inclusion of Ripley in the list of villages to allow insetting.

52. Policy P2 refers to the Metropolitan green belt yet goes on to create additional green belt in the west of the borough furthest from the metropolitan area. There is no justification whatsoever for new green belt land in Ash.

53. There is no evidence that cross-boundary options beyond the green belt have been considered as a viable option instead of moving the green belt boundaries within the borough.

54. I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.

55. I strongly object to policy P5 TBHSPA as no regard whatsoever is paid to the impact of air pollution on the integrity of the heathland and the resultant loss in habitat from nitrogen deposition. It is inconceivable that the level of development proposed in this plan will result in anything other than thousands more vehicles on the roads due to the unsustainable locations of for example policy A35. Additional traffic equals more pollution and more nitrogen deposition. There is no evidence at all of any in-combination impact from planned developments in adjacent boroughs and no regard to the recent Wealden case for example.

56. I also reject that the SAMM mitigation through the use of wardens will have any impact on cat predation.

57. I object to the statistics in para 4.3.55. Any survey work done on the visitor numbers is unlikely to have covered the time when commercial dog walkers from South London who appear in droves throughout the week.
58. I object to para 4.3.57 – there is no evidence that SANG provided adjacent to the SPA will provide any mitigation at all. Faced with the choice of walking in a manmade environment or on the SPA, the majority of people would choose the natural environment.

59. 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.

60. I do not understand why previously developed sites in the green belt have not been included for development. Specifically, HMP Send where the prisoners have been told that they might be moving and indeed the site is understood to have been valued by Savills amongst others. There is no justification for adjustment of green belt boundaries until all other options have been exhausted. Doubtless there are other examples.

61. I object to para 4.4.36 with regard to the extension of the Surrey Research Park. There is no justification for this when there are a number of surface car parks within the Research Park which should be used in preference. The density of buildings in the Research Park needs to be prioritised over an extension in area.

62. 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….

63. 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.

64. 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.

65. I agree with the insertion of para 4.5.8a 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.

66. I support the inclusion of policy D4.

67. In Guildford borough, it is widely accepted that there is an infrastructure deficit particularly in roads and the provision of health services. The needs of current residents are not taken into account in policy ID1. All infrastructure should be in place before development of strategic sites takes place to ensure that the developer pays so as not to jeopardise the needs of current residents.

68. There is insufficient weight given to the problem of air pollution in the borough. I object strongly to the fact that the Council does not take the health of its residents sufficiently seriously to have a policy to ensure the improvement of air quality in the life of the plan.

69. I object to the wording of policy ID3 para 11 which makes no sense at all. What do you mean by “the provision of additional public off-street parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise derive through the Guildford gyratory”?

70. 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.

71. I object to the inclusion of policy A58 – there is no justification for an increase in additional industrial floorspace at this location or indeed particularly as there are a number of vacant industrial sites at Slyfield.

72. The AECOM work to support the ELNA is a poor piece of work riddled with unsupported assumptions.
I continue to object to the inclusion of the following policies:
- A36-A41 inclusive in the Horsleys, A43 at Garlick’s Arch, A42 Clockbarn, and A58. There is no evidence that anyone has considered the cumulative impact of these developments together with the development at A35. The infrastructure proposed is totally inadequate and, as these stand at the borough boundary will have a huge impact on residents throughout the borough and further afield, particularly those who use the A3.

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.

I object to the fact that the land required at Garlick’s Arch is said to be almost 29ha where only 13ha is required at 30dph.

Similarly, I object to the excess requirement for land at A53 where the normal plot ratio of 50% appears to have been ignored resulting in an excess use of green belt land of over 7.5ha.

I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.

I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

The transport evidence provided shows an increase in congestion as a result of the planned developments. Insufficient modelling has been done to satisfy me that any of the strategic sites can move forward on this basis. The consequences are severe to residents of Guildford and those much further afield.

I object to the fact that there is no proposed location for a bus station in the town centre. This means it is impossible to model journey times from, for example A35 with any degree of reliability. Furthermore, the modelling capacity at SCC does not use “real world” situations for example the junctions do not allow for traffic stopped at red traffic lights and assume all time all direction running which is clearly a fallacy. This perhaps makes it easier to understand why the today’s congestion is so dire.

There is no evidence that noise and light pollution and the impact on both humans and wildlife has been adequately taken into account.

I object to the fact that policy S2 makes no distinction between previously developed land in the Green Belt. It is clear that the use of a site with no above ground building e.g. A35 has a far greater impact than the use of a site such as Send Prison.

I object to the fact that greenbelt sites are allocated to improve flexibility in the delivery of the plan. It is clear that the green belt should only be seen as a last resort, after all other opportunities have been fully explored.

I object to the use of a film on the GBC website promoting a biased view from those interviewed who would in the real world have been excluded due to conflicts of interest. This is unfortunately completed expected behaviour from a council that continues to promote opaque policy and one which has little respect from many residents.

I object to the fact that the prosed housing allocation at Slyfield of 1000 homes results in no increase in vehicles. This is a patently false assumption and leads me to question the soundness of the transport evidence base.

I object to the variation in the assessment of sites which is extremely inconsistent. In some cases the TBHSPA appears to be a concern whereas in others it isn’t. The same applies to a number of elements including impact of conservations areas, SNCIs, views in and out etc.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. It is very worrying that the council does not appear to have either the resources or the intellect to get the basics right.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5759  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The re-inclusion in the plan of Site A35 Three Farms Meadow, alias the former Wisley airfield, Ockham following a huge public outcry, and after Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds has deceived many residents into thinking that it has been defeated.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected.

Policy A35 should be removed from the plan for all the reasons the development was rejected by the Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6892  Respondent: 8729089 / Andrew and Fiona Groenewald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
OBJECT, This was already refused by the planning committee.

OBJECT Its Greenbelt

OBJECT Traffic nightmare for the whole of the area. Ripley, Send, Ockham, Horsleys, Effingham are already running at road capacity.

OBJECT- Air pollution is already bad at the M25/A3 Junction.

OBJECT- unsustainable as stuck in the middle of nowhere, no facilities, no utilities.

OBJECT, impact on SPA Cannot be mitigated by SANG on its doorstep.

OBJECT current rights of way being affected or ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the change of name of this proposed site.

This site is not just an old airfield! The majority of this site is agricultural and the title should reflect that.

I object to the increase in the size of this land parcel, all of which is in the greenbelt.

I object to the intended mitigation regarding traffic at Clandon/Send junction as this will do nothing to protect the local area. Traffic from this site will predominantly be travelling towards London in the morning, as is reflected around the home counties, thus the impact will be felt at Jct 10 /M25. Air pollution and congestion at this junction is severe and further traffic movements will increase the problem.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6276</th>
<th>Respondent: 8732737 / G McCourt</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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>Again no infrastructure : Transport ?</td>
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<td>&gt;&gt;&gt; No regular busses to take people to the only 2 train stations near by, being Horsley or Effingham, which are both totally unsuitable for thousands more commuters either from the Wisley site or from the Horsley proposed sites.</td>
<td></td>
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<td>&gt;&gt;&gt; These train stations are small and serve the villagers at the moment, but could not accommodate thousands more commuters.</td>
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<td>&gt;&gt;&gt; The Wisley site needs busses to take the population to Guildford, Cobham.</td>
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<td>&gt;&gt;&gt; They would need a Doctors Surgery, schools, junior and senior as all the local schools are over subscribed in the surrounding areas</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: PSLPS16/1457</th>
<th>Respondent: 8733857 / Tony Edwards</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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>I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.</td>
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</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposed Wisley Airfield development which would have an enormous unquantified impact on the surrounding villages. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

2. THREE FARMS MEADOWS SITE (Wisley Airfield) Policy A35 I STRONGLY OBJECT to the plonking down of a new town of some 2000 new houses in the middle of the greenbelt in the middle of nowhere. This planning application was unanimously rejected by the GBC planning committee recently on 14 separate grounds. The site is miles away from any public transport, is on a site that floods regularly and is surrounded by narrow, muddy, winding, unlit country lanes. The addition of at least 4000 cars will cause a constant gridlock throughout the area. An assumption that residents will walk or cycle to reach amenities is totally unrealistic. An infirm pensioner cannot be asked to walk along these narrow lanes to the doctor and to expect them to cycle is madness. There is no employment nearby which would result in a huge growth of commuter traffic on the A3 and nearby country lanes causing more pollution and traffic jams.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposed development of more than 2000 houses on the site of the former Wisley Airfield as the impact of this on the Horsleys which are less than 2 miles away would be completely unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1058  Respondent: 8742689 / Keith Michel  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We refer to our letter dated 23'd June and would ask you please to note our further objection/comment as follows -

1. We are of the view that the proposal to create the equivalent of a new town development on the former Wisley Airfield site (Paragraph 4.3.17 and Policy A35) and to remove the area from the Green Belt amounts to an unjustified incursion into the Metropolitan Green Belt and a contravention of the existing Green Belt regime. Kindly note our objection therefore to this item of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3215  Respondent: 8743073 / Darrell Howard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Wisley Airfield site should be removed from the Plan. It is astonishing that this site has been included in the proposed Plan given that its planning application was unanimously rejected by GBC's Planning Committee. This site should remain in the Green Belt as it serves a vital role in protecting against urban sprawl from London. Again, there are no exceptional circumstances to justify its removal from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3475  Respondent: 8743073 / Darrell Howard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
• The Wisley Airfield site should be removed from the Plan. It is astonishing that this site has been included in the proposed Plan given that its planning application was unanimously rejected by GBC’s Planning Committee. This site should remain in the Green Belt as it serves a vital role in protecting against urban sprawl from London. Again, there are no exceptional circumstances to justify its removal from the Green Belt.

To conclude, it is my opinion that the Local Plan is flawed, and is riddled with inaccuracies and unsubstantiated conclusions. It is a development-led, not needs based Plan, and has been devised using an overinflated housing target either by design or through incompetence. It is clear that the same type of errors and deceits are being repeated as with the 2014 Draft Local Plan despite the changes to the senior personnel responsible for the Plan.

I urge GBC to stop the current process and set about producing a Plan that is focused on housing need, not economic or commercial growth, and which is based on sound and transparent data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1405  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The legal requirements

The Planning and Compulsory Purchase Act 2004 (the Act) states at s39 regarding Sustainable development:

1. 1. Statutory requirements regarding sustainability

2) The person or body must exercise the function with the objective of contributing to the achievement of sustainable development.

- For the purposes of subsection (2) the person or body must have regard to national policies and advice contained in guidance issued by-

- the secretary of State for the purposes of subsection (1)(a) and (b);

- The National Assembly for Wales for the purposes of subsection (1)(c).

National policies which the Act requires CBC to have regard include those set out in the National Planning Policy Framework (NPPF) at, for example, paras 10, 14, and 17.

Para 10 states "Plan s and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas".

Para 14 states "Local Plans should meet objectively assessed needs... unless, any adverse impacts of doing so would significantly and demonstrably outweigh the benefits,

When assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted."

Para 17 sets out 12 core planning principles. These include
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.

Take account of the different roles and character of different areas,

promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;

Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;

conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and

Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Support the transition to a low carbon future in a changing climate,

- Failure to apply or to apply properly the legal requirements concerning the conservation of the land at the former Wisley airfield, the Parish of Ockham and the Ward of
- The evidence base contains errors regarding this site.

For example, the settlement hierarchy gives a wholly inadequate and inaccurate description of the village of Ockham. Ockham is not a nuclear village with one village center. It is a collection of agricultural settlements distributed around the Parish.

This YouTube video provides a more accurate and fuller picture of the Parish of Ockham and the place of the land at the former Wisley airfield within it:-

http://youtu.beNVnUUDSxKJk

- No legal argument or relevant facts are produced to justify taking the land out of the Green Belt

GBC engaged Pegasus Consulting to carry out a 'Green Belt and Countryside Study'. However, the question of whether there exist 'exceptional circumstances' for changing the Green Belt boundaries as required by NPPF 83 is expressly not included in Pegasus's remit.

The Green Belt and Countryside Study therefore does not produce relevant evidence. It does not answer the logically prior question. Without first knowing the answer to the logically prior question, it cannot be known if Pegasus' work is required.

S 22 of Vol V of the Green Belt and Countryside study seeks to analyse whether or not this site meets the purposes of the Green Belt. However, this is not a relevant argument. There must logically be a presumption that the land satisfies the purposes otherwise it would not have been put into the Green Belt in the first place or have survived through successive local plans.

If no exceptional circumstances exist to justify removing this site from the Green Belt then the Pegasus report is a waste of public money. The various misdescriptions of the site would still be irrelevant even if they were accurate. For example, Pegasus states that the land is an Airfield. That is not correct. No planes have flown from this site since 1972. 75% of the site is countryside - either actively cultivated or wood and grassland. But even if the site were an airfield it would make no difference to its Green Belt status.
Pegasus purports to analyse whether the land meets the 'purposes' of the Green Belt. This analysis is motivated by a desire to show that the land should not be in the Green Belt. But Pegasus is applying the wrong test. The correct test is whether there are 'exceptional circumstances' - a test which Pegasus excludes from its remit.

The Judge in the COPPAS case stated: 'I would hold that the requisite necessity in a PPG 2 paragraph 2.7 case like the present - where the revision proposed is to increase the Green Belt - cannot be adjudged to arise less some fundamental assumption which caused the land initially to be excluded from the Green Belt is thereafter clearly and permanently falsified by a later event. Only then could the continuing exclusion of the land from the Green Belt properly be characterised as "an incongruous anomaly". The test applies symmetrically if the intention is to remove land from the Green Belt.

Nowhere does the local plan makes the argument that some fundamental assumption has been clearly and permanently falsified or produces evidence to support it. Far from some fundamental assumption which caused this land to be included in the Green Belt being falsified - the subsequent development of the surrounding towns and cities has in fact fortified rather than weakened the original assumptions.

Pegasus uses the purposes of the Green Belt which are defined in the NPPF to test the Green Belt in the borough of Guildford. Pegasus makes a presupposition that the NPPF definition is the only determinant of the value of any particular part of the Green Belt. The definitions in the NPPF are necessarily general because they must apply to all Green Belts across the entire country. The tests chosen by Pegasus are not logically the only tests or even the most relevant tests. Apart from looking at the most general definition of a Green Belt in the NPPF it is also legitimate, indeed essential, to consider the purposes of the specific Green Belt under consideration. The Green Belt in the borough of Guildford was not established to protect Guildford but to serve the Metropolis of London. A highly relevant consideration or test is whether part of that Green Belt serves the Metropolis. Pegasus fails to consider this at all. Whether the land serves the Metropolitan Green Belt is, nonetheless, the single most important consideration. Does the land at the former Wisley airfield serve the overriding purpose of the Metropolitan Green Belt? Any disinterested evaluation must conclude that it does.

Just to demonstrate how self-serving and prejudiced the Pegasus report is it is worth looking at its statements about whether this land meets the purposes of the Green Belt:

**Purpose 1: to check the unrestricted sprawl of large built-up areas**

Pegasus state: Due to the airfield site not adjoining the main urban areas within the borough, it does not offer the opportunity for such urban areas to sprawl in it. As a result the Green Belt does not serve this purpose in this location.

This statement is not correct in several respects. The site is not, for the most part, even an 'airfield'. The land does not have to 'adjoin' an urban area to serve the purpose of separating urban areas. Nor are the only relevant 'urban areas' within the borough of Guildford. Adjoining boroughs are also relevant. Cobham, Woking/Pyrford, Byfleet, Ripley and Horsley are all 'large built up areas' and the land is centrally placed between all three developed areas. The logic of the argument is fallacious. Taken to its logical conclusion only the last blade of grass between two settlements would serve to separate them - a ludicrous proposition.

Moreover the land serves to separate London and its suburbs to the North from Guildford and its suburbs to the South.

**Purpose 2: to prevent neighboring towns merging into one another**

Pegasus state: Land parcel C 18 did not include any settlements, as a result there was not the potential for development within this part of the Green Belt to result in coalescence between existing neighboring towns, and the land parcel was not considered to serve this purpose accordingly in Volume II.

Rather than set out an argument Pegasus refers to another Volume of their study, which is hardly helpful. Only the most pedantic and literal of interpretations can deny that the land separates Ripley Cobham, Byfleet, Woking and the Horsley's.
The map below from Surrey County Council shows how the land at the former Wisley airfield ('Three Farms Meadow') is strategically positioned on the watershed between two river valleys and separates Cobham, Horsley, Ripley, Woking and Byfleet:

The land preserves the setting of the ancient settlements of Ripley and Ockham and Cobham.

Purpose 3 to assist in safeguarding the countryside from encroachment

S22 concedes that the land serves this purpose. It could not do otherwise. The land is countryside.

Purpose 4: to preserve the setting and special character of historic towns;

S22 argues that there are no historic towns nearby. Ripley is nothing if not an historic town situated on the main route between London and the Royal Navy in Portsmouth. Ockham and Wisley are nothing if not historic villages.

Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Pegasus' comments are incoherent. All Green Belt land serves this purpose by obliging developers to look to brownfield land first.

In short the consultants employed by GBC seek to undermine the land's Green Belt status in order to remove its protections from development. This approach is a waste of time and money. The logically prior question of whether or not 'exceptional circumstances' exist should have been asked and answered first.

- the land is not a sustainable site for a new town

The site does not meet GBC's own criteria for sustainability. The s 22-report states

'At present the Wisley Airfield PMDA C18-A would score very poorly in sustainability terms because there are no facilities and services in place.'

- Infrastructure

The evidence base gives inadequate consideration to whether local infrastructure has any spare capacity for more houses - beyond what is needed to meet local demand. Para 162 of the N PPF is not properly complied with.

2.3.1 School capacity is in the area is already at capacity and the hypothetical capacity which is mooted for the site is insufficient

The s22 report conjectures that provided the site is sufficiently large and attracts a sufficiently large population the site may attract services and facilities:

"For these reasons it is not considered helpful to provide a specific potential sustainability score for the site, but instead provide a range of scoring that would appear feasible, the centre point of which is based upon the following assumptions."... "In accordance with the IHT 'desirable' walking distances identified within Volume II, Table 5.3, the following could realistically be provided:

Primary School - 500m or less Nursery - 500m or less Healthcare facility - 500m or less Local Centre - 200m or less Community Centre - 400m or less"

This analysis is completely arbitrary. An analysis which is limited to 'walking distances' is completely trivial. No serious examination of the existing school capacity in the rest of the ward and borough is made. Any new provision which might become available at a 'new town' is unlikely to be viable for many years. In the interim the residents of the new town would be completely dependent on facilities in other neighbouring settlements. At present there is a substantial shortage of available school capacity in the area. The main primary school, The Raleigh in West Horsley is overflowing to the
extent that its playground is now completely filled with temporary classrooms. The nearest secondary school is in Effingham and is unable to cope with existing demand. The next nearest secondary schools are in Guildford and Woking. Travel times from this area to Guildford and Woking are not appropriate for school children.

- Road transport access is inadequate/nonexistent Access via Elm Corner

The site currently has an access via the hamlet of Elm Corner -which forms part of the Parish of Ockham. Elm Corner does have an access onto the A3. But it has no acceleration and deceleration lane. It is consequently very dangerous. The Highways authority tolerate this situation because a) it has been there since before the A3 was turned into a three-lane motorway b) the number of cars entering and leaving Elm Corner is very low -as there are so few houses. However the Highways Authority has in the past refused permission for filming projects to access this site from Elm Corner on the grounds that large flows of daily traffic would impede the flow of traffic on the A3 and cause a traffic hazard. Given this, it is absolutely inconceivable that the Highways Authority would ever permit access to a ‘new town’ of 2,500 houses via Elm Corner.

Access via a planned new road onto the roundabout at Ockham Road North/Stamford Brook

This roundabout provides an exit for southbound traffic on the A3 to Ripley and the Horsley’s. It also provides access to the northbound lane of the A3. It provides no access to the southbound carriageway of the A3 going to Guildford/Portsmouth.

Wharf Land, from which WPI purchased the site, received permission to use 17 out of 17ha of the site as a waste processing facility. They won this permission on appeal to a planning inspector. They got permission subject to over twenty different conditions and because the Inspector accepted that the Surrey Waste Plan was short of waste sites.

That permission cites as a condition the building of a new access from the southbound carriageway of the A3.

Permission for an access for a waste site does NOT constitute ‘permissioned access’ for a new town. The new town and the waste disposal site are mutually exclusive projects: they cannot both proceed as the new town proposes to use the acreage set aside for the waste plant.

The permission to access the A3 is exclusively for a waste site. The permission is not transferable to a new town proposal. First WPI need permission from SCC to relinquish the 17ha now set aside for waste processing. That permission is not a foregone conclusion. Second, WPI needs to re-apply for permission to build an access for a 2,100-house new town. That is not a foregone conclusion either.

- Local roads already at capacity

The A3 is already at capacity. Every morning the A3 slows to a standstill or to a crawl between the Ripley turn off and the M25 on the northbound carriageway. Traffic through Cobham High Street (A245), Ockharn Road North through East Horsley (B2039) and Byfleet Road (A245) are already at capacity during the rush hour. Everyone who uses these roads knows that very long tail backs are already a regular occurrence.

SCC Options Growth Scenarios Transport Assessment Report confirms that a new town would take traffic conditions to a state of flow breakdowns.

GBC has commissioned SCC to do a traffic analysis -of the impact of ALL of the proposals in the Local Plan.

This analysis is set out in the Local Plan ‘Evidence Base’.
The WPI new town is a small part of the overall analysis -which itself is subject to some major provisos:

1. It is based on 'trip analysis' data derived from an out of date census in 2001 - at least 10 years
2. It is based on data provided by GBC -and not disclosed or It is understood this data is from 2009 - ie during a recession.
3. It is top down:

SCC wrote: 'This study was undertaken at a strategic scale and consequently not all impacts of developments have been identified. However, developments of, and above, a certain scale will require individual transport assessments to be commissioned ...'

Projected Level of Service (LOS)

SCC use LOS to measure road capacity. The scale runs from A to F.

A is 'Free Flow'.

F is 'Every vehicle moves in lock step with the vehicle in front of it, with frequent slowing required. Travel time cannot be predicted, with generally more demand than capacity.

Is there sufficient spare capacity to accommodate a 'new town'? No. Under 'scenario 5'

(the relevant scenario) 'A3 northbound between Ockham and Wisley is rated, guess what, F!

Ratio of Flow to Capacity (RFC)

The other tool SCC uses to measure the performance of a stretch of road is RFC.

'An RFC value greater than 1 means that the stretch of road or turning movement has a higher level of traffic flow than its theoretical capacity. As a result flow breakdown and extensive queues can be expected'

What is the RFC value for the A3 between Ockham and Wisley under scenario 5?

It is 1.02.

Remember that is based on out of date census data.

What is the traffic like now?

Anyone who uses the A3 knows that between Ripley and Junction 10 of the M25 the A3 slows to a standstill EVERY MORNING. (Our children go to school in Guildford. We see this every morning.)

That is the situation today.

Strategic thinking

One of Guildford's strategic advantages is its location between London, Heathrow and Gatwick.

If the traffic on the M25 between Heathrow and Gatwick gets worse - or gets an RFC score of over 85% then Guildford will have shot itself in the foot and destroyed one of its present competitive advantages.

Proposed road closures

To enable a new town at A35 Surrey County Council has proposed the following measures:

- Closure of Ockham lane near Upton Farm
- Closure of Plough Lane
3) Old Lane to be one way from the J3

- Guileshill Lane to be one way from Ripley

The closure of these ancient routes would have a devastating effect on the amenity of existing residents. Journey times from Martyr’s Green to shop in Cobham or Ripley would double. Access to the A3 would take many times longer.

The drastic measures suggested illustrate perfectly that a new town on this site is not sustainable.

New works to facilitate a new town

The developer states that new works on the M25 and A3 would facilitate a new town on this site. They would not. They are required merely to relieve at least in some part the existing congestion. Plans to build a new Jane on the M25 between J1 Q and J14 using the hard shoulder are mere speculation. Even if built a new lane would only supply much needed current capacity - not capacity for new towns.

- Public transport

WPI promote the site as having access to NINE mainline stations within 5 miles. As usual WPI’s statements are at best promotional and at worst just false.

They are Woking, West Byfleet, Byfleet & New Haw and Weybridge on the Woking line and Clandon, East Horsley, Effingham Jnctn and Stoke D’Abemon on the Guildford branch line.

It is a stretch to call the Effingham line a 'main line'. It is a suburban stopping service. The Woking line is, indeed, a main line. But you'll only get on a fast train in Woking or Weybridge.

The distance from Elm Corner at the former Wisley Airfield to Woking is shown as 6 miles on Google maps and over 11 miles for the return journey

Anyone who has ever made this journey will know that it is rare that the journey can be done in less than half an hour especially in rush hour when it can easily take 40 minutes or more.

The distance from Elm Corner to Weybridge is shown as 6.9 miles on Google maps. If you don't get stuck on Byfleet Road in the rush hour you'd be lucky to do the journey in less than 40 minutes.

WPI claims that buses will run with a 10-minute frequency. None currently exists in Ripley Horsley or Cobham. This is pure marketing puff.

- The site is too small to be sustainable on the basis of the evidence provided

Pegasus state that a site area of at least 110 ha is required to support a 'sustainable' site. GBC included neighbouring land in the site without consulting the landowners. That indicates a clear bias in favour of development.

When those landowners wrote to GBC to state that their land was not available and would not be sold, GBC continued to include their land in the site until challenged in writing with an opinion from Leading Counsel.

After receiving Leading Counsel’s opinion GBC reduced the size of the site to 69ha. The number of houses is reduced from 2,500 to 2,100. This represents a site density of 33 houses per hectares without allowing any land for the proposed facilities such as schools and shops and the necessary roads and car parking.

The Issues and Options paper stated that land opposite this site at the Royal Horticultural Society was NOT suitable for development as being a) reliant on car transport b) requiring inappropriate housing densities and c) being too close to the Special Protection Area (SPA) around Ockham Common. Identical arguments apply to this site. The failure to apply the same logical to sites within a few hundred metres of each other is yet another indication of prejudice.
Environmental limits

The UK Sustainable Development Strategy 2005 states that development should have regard to 'Living within environmental limits'. This local plan gives no consideration to these. The sustainability appraisal is not complete. The requirement of NPPF para 165 has not been met.

Habitats Regulations Assessment

When the consultation process for the first draft of the local plan began GBC did not have a Sustainability Assessment. The HRA was not completed until AFTER the draft local plan was sent out to consultation. The consideration given to A35 in the HRA is perfunctory. It merely 'parks' the issues:

Development of a new settlement could lead to effects on the Thames Basin Heaths SPA, through reduced air quality from associated transport movements and increased recreational pressure.

Other comments are wrong and/or banal:

Release and designation of Green Belt land in itself does not have HRA implications; however, a strategic approach to support the integrity of the Thames Basin Heaths management strategy would be beneficial.

The serious problems of attracting more visitors to the SPA/SSSI at Ockham Common are mentioned but not seriously addressed:

Increased access to the countryside needs to be managed in a way that does not lead to increased recreational pressures on the Thames Basin Heaths.

The evidence suggests that GBC could not be trusted to provide the necessary 'management'

Ockham is not discussed at all in the document. It appears in a list of 'Hamlets' and there is a statement that a 'settlement hierarchy' designation does not have HRA implications. That statement is not self-evidently true - especially in relation to creating a new town in the centre of Ockham which would be the third largest settlement in the entire borough.

SNCI

The available evidence for Sites of Nature Conservation Interest is nine years out of date. The whole of the land owned by Wisley Property Investments Ltd within AJ5 has been proposed as an SNCI:

If the new town comprises 2,100 houses and if their pet populations follow the national averages then the new town will bring approximately 350 new cats and some 500 new dogs to the area immediately adjacent to the SPA. It is not credible that it will be possible to exclude these from the SPA.

This site is too close to the SPA. Part of the site is an SNCI which the local plan proposes to build on. The SNCI is part of the 'living landscape' and forms an essential corridor through which wildlife can migrate to and from Ockham and Wisley Commons.

The local plan proposes using a substantial proportion of the site as a Suitable Alternative Natural Greenspace or SANG. The purpose of a SANG is to attract the public AWAY from the SPA. A SANG adjacent to the SPA is likely to have the opposite effect. The choice of location for the SANG is driven purely by expediency (for the developer) and is otherwise irrational.

Information about the wildlife on Ockham Common can be found in this YouTube video:

http://youtu.be/IHdoj-8tfO

Heritage Assets
The evidence base for this is nonexistent. The Council has had years to consider this. It has carried out some Conservation Area Character appraisals. Unsurprisingly it has not done one for Ockham and Ripley. Without such an appraisal how can the Council claim seriously to have properly evaluated whether Ockham is a suitable and sustainable site for the third largest town in the borough?

There are several Conservation Areas in the ward - the largest being Ripley Village itself. There are 49 Listed Buildings in Ripley, 29 in Ockham and 6 in Ripley. Despite this no assessment of the heritage assets in Ripley Ockham and Wisley has been completed. This is contrary to the requirements of The Listed Building and Conservation Areas Act 1990 and NPPF para 126 and 132.

Information about the Heritage of the Parish of Ockham can be found in this YouTube video:

http://youtu.be/Pb0i6Jgbst0

- Rural economy

It is a core principle of the NPPF (set out in para 17) that planning should support thriving rural communities. Ockham has thriving rural communities with several businesses based on agriculture and horse riding and stabling. The removal of up to 1 14ha of land which is currently actively farmed will cause irreparable harm to the local rural economy and is likely to result in permanent job destruction.

nowhere does the local plan make any consideration of this.

This local plan should be condemned for failing to follow the planning principles set out in NPPF para 17 and failing to set out all the required evidence and to justify its proposals. GBC is culpable for

- putting this site into the local plan without legal or factual This has wasted everyones time and money
- putting the site into the local plan before critical parts of the evidence base are available or complete - as described above
- seeking to draw conclusions about the development potential of the site which are not justified by the facts
- not taking account of public feedback from the Issues and Options consultation
- collusion with the developer - to the extent of 'regulatory capture'

The attempt to take this site out of the Green Belt in collusion with the developer without relevant evidence or legal argument is a disgrace.

The definition most widely accepted globally is the 1987 United Nations one from the Brundtland Report: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs". Developing this site is not consistent with the principle of sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 5.PNG (529 KB) 4.PNG (400 KB) 6.PNG (231 KB) 8.PNG (4 KB) 7.PNG (272 KB) 1.PNG (358 KB) 3.PNG (353 KB) 2.PNG (292 KB)
No legal argument or relevant evidence to support the development of this Green Belt site has been presented.

Development of the site contravenes the NPPF para 83 and para 89, inter alia.

1. The references to site allocation A35 in the local plan

There are a limited number of references to this site in the Local Plan Strategy and Sites document, specifically in

- section 3 (SpatialVision) where it is stated that a new settlement will be created at this site,
- Policy S2,
- para 3.17 where it states whilst the general extent of the Green Belt has been retained, land has been removed from the Green Belt in order to enable development around Guildford urban area, selected villages, and at the former Wisley airfield. The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence.
- Appendix C on infrastructure.

Policy P2 Green Belt

Policy P2 - inside the Blue Box - does not mention site A35. The policy states, 'We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.'

Since the former Wisley airfield is designated Green Belt one might at first sight conclude that it was protected by Policy P2 which 'will continue to protect the Metropolitan Green Belt....against inappropriate development..'.

However the promise is qualified by reference to the 'proposals map' - which one supposes must refer to the 'Policies Map'.

[1]

However the former Wisley airfield is mentioned in the supporting paragraphs to Policy P2:

4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify
the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of develop

4.3.17 Whilst the general extent of the Green Belt has been retained, land has been removed from the Green Belt in order to enable development around Guildford urban area, selected villages, and at the former Wisley airfield. The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence.

Site A35 is also mentioned in Policy 14 'Green and Blue Infrastructure' where it is mentioned as a previously developed site, and at Policy S2 'Borough wide strategy' where it is mentioned as contributing 2,000 houses.

A word search confirms that there are no other references to this site in the Strategies and Sites document.

2. The local plan is devoid of legal argument or relevant evidence to support the development of the former Wisley

All the references to the former Wisley airfield in the Strategies and Sites document are cited in part or in full above. It is remarkable that not one legal argument and not one piece of relevant evidence is evinced to support the proposition that this Green Belt site should be developed.

The complete absence of any attempt to provide legal argument and relevant evidence is so remarkable as to be astonishing and extraordinary.

Far from providing positive legal argument and relevant evidence to support development nothing is advanced to counter objections arising from the obvious and multiple contraventions of the NPPF.

Since no positive legal arguments are advanced the public is unable to refute them. It is faced with the administrative injustice of being asked to respond to a consultation about a governmental decision that has not yet been made and a potential action that is contingent on future argument.

In case the argument is run that the legal justification for changing the Green Belt boundaries is set out elsewhere in the evidence base, it should be noted that the authors of the Green Belt and Countryside Study explicitly and expressly state that it was NOT part of their remit to consider whether exceptional circumstances exist. On page 3 of Vol V Pegasus expressly state that evaluation of exceptional circumstances is not within their remit:

18.4 Whether exceptional circumstances exist will depend not only on the site specific circumstances but the wider background also. For example, if it is established that suitable alternative locations can come forward to provide for the necessary level of housing for the borough, then it is possible that exceptional circumstances will exist subject to the assessment of other considerations put forward in paragraph 116 of the NPPF.

18.5 It is not within the remit of this Study to assess whether exceptional circumstances exist to enable major development, and there is clearly some uncertainty over what GUILDFORD BOROUGH GREEN BELT AND COUNTRYSIDE STUDY 4 should be classed as major development in such instances. As a result, any PDAs that are Identified in this Study within the AONB would require closer scrutiny by the Cot.nec prior to any allocation being made. This would take account of the latest information at the time before conclusions can be drawn on, firstly whether exceptional circumstances need to be demonstrated, and secondly if they can be.
In the absence of any positive legal case being presented for changing the Green Belt boundary at site A35 no further consideration should need to be given to this matter. The proposition is self-evidently contrary to the NPPF and it is an abuse of administrative power to force this site into the draft local plan and oblige the public to consider a completely hypothetical and unsupported proposition.

3. Proposed development of site A35 would contravene the NPPF’s protection of the Green Belt - set out at para 83.

Most obviously the NPPF protects the Green Belt against inappropriate development. Since the former Wisley airfield is in the Green Belt all development of it is by definition inappropriate.

Para 83 NPPF states:

83. 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.

The local plan omits to mention ANY exceptional circumstances. GBC has not properly set out coherent legal argument and relevant evidence to show that exceptional circumstances justify altering the Green Belt boundaries to exclude this land from the Green Belt. I attach GBC’s disclosure of its understanding of the meaning of exceptional circumstances. This is not consistent with the more stringent definition of the meaning of the words set out in the legal precedents laid down by the courts, in particular the Court of Appeal. For the avoidance of any doubt, the courts have held that the mere process of creating a local plan does NOT itself constitute an ‘exceptional circumstance’. 

Advice given by Mr David Vickery (of the Planning Inspectorate) to St Albans in 2009 stated:

5) The numbers of houses presently needed on Green Belt land and their approximate locations should be stated. The exceptional circumstances that require this course of action should be stated. Any suggested location should be sustainable and have as little effect as possible on the Green Belt. If possible, the need for Green Belt release should be phased to the end of the plan period so that the detail of the sites and their boundaries could be devolved down later Site Allocators DPD using regional and national guidance. If selection, together with any local criteria that may be appropriate to state in the CS. The CS would also have to say (or delegate the I task to a later DPD) what would be the mechanism or circumstances that would trigger the release of Green Belt land for housing.

I attach the full note of Mr Vickery’s advice to St Albans.

GBC’s draft local plan does not adhere to this advice because this site (site A35) is in the
Green Belt and the exceptional circumstances that require building on it have not been stated. Moreover the site is demonstrably NOT sustainable.

3. Proposed development of site A35 contravenes declared government policy.

Eric Pickles wrote to Sir Paul Beresford MP on 4 August, 2014 as follows:

Our National Planning Policy Framework asks local authorities to plan to meet locally assessed housing needs in full. It is up to each local authority to decide how best to meet its objectively assessed housing need (and other development needs), whether through a Green Belt review or not. However, there has been no weakening of policy in this area: the Framework is quite clear that permanence is one of the essential characteristics of Green Belt, and it emphasises that Green Belt boundaries may be altered only in exceptional circumstances. If a local authority considers that adjustments to such a boundary are essential, they can be taken forward only through the Local Plan process. We have also made clear that it must always be transparent that it is an authority itself that has proposed reviewing its Green Belt.

Nick Boles wrote to Sir Paul on 7 February, 2014:

Green Belt protection

My letter to you emphasised the importance we continue to attach to Green Belt as a way to prevent sprawl and encroachment on open countryside. The National Planning Policy framework provides strong protection: It states that permanence is an essential characteristic of Green Belt, that inappropriate development in Green Belt should not be approved except in very special circumstances, and that a Green Belt boundary may be adjusted only in exceptional circumstances, using the Local Plan process of consultation followed by independent examination.

4. Proposed development of site A35 is not eligible for any of the exceptions in NPPF para 89

GBC do not advance the argument that the site may be developed under any of the exceptions provided for in para 89 of the NPPF.

It is correct not to do so.

It is dubious whether much if any of the site meets the definition of 'previously developed land'.

The NPPF definition of previously developed land is:

**Previously developed** land: 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. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

The land was previously used for war-time purposes and 'provision for restoration was explicitly made'. War time purposes do not come into the NPPF definition of previously developed land. But in all justice they should - especially where *provision for restoration* was made by HM Government and then subsequently reneged upon.
Even if reliance is not placed on the implied exemption for land for which 'provision for restoration' was made, it is the case that the former Wisley airfield falls into the exclusion (to the exception) set out in the definition, namely 'the remains of the permanent structure or fixed surface have blended into the landscape in the process of time.'

The original structures were ALL removed when the land was sold back to its original owner under the Crichtel Down code provisions as agricultural land in 1980. The runway was not removed for reasons of cost. It is not accepted that the runway falls within the meaning of 'fixed surface structure'. But even were it to be accepted purely for the purpose of argument it has blended into the landscape in the process of time. The present development proposals envisage NO reuse of any part of the original structures.

Para 89 NPPF states

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt Exceptions to this are:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings) which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Para 89 provides for previously developed sites in Green Belt to be redeveloped provided that the development 'would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.'

There is no 'existing development'. But even supposing for the sake of argument that the former runway were deemed to be development despite there being no structures, redevelopment as a 'new settlement' of 2,100 houses could not possibly be considered to have no greater impact than the existing runway.

No more than a very small part of the site could be considered 'previously developed'. The developer's website describes the land as follows:

[2]

The majority of the land is agricultural and that land does not and never has met the definition of 'previously developed'. So by definition development is inappropriate and no exceptions under para 89 are available.
On these figures less than 26% of the site is 'concrete'. However the area of concrete exaggerates the extent of the land which could conceivably be considered 'previously developed', if any. This is because the only part of the concrete which had structures on it, namely the area of the aircraft hangars, is much smaller than 74 hectares. It may amount to less than 30 acres.

Moreover, that area which was formerly covered by aircraft hangars is already subject to a development proposal which has received planning permission for an 'In Vessel Composting Facility' covering some 17 hectares (c50 acres) out of the total land area of 114 hectares. That land is presently not available for house building. If that land is excluded then it appears that none of the land could conceivably be previously developed.

Exceptional circumstances

The Gallagher v Solihull case (April, 2014 High Court England & Wales) clarifies that the NPPF has not changed the previous definition of 'exceptional circumstances'. The judge stated:

'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 reviews of the Green Belt in the context of reviews of Local Plans ... and has always required 'exceptional circumstances'.

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 the 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.'

In Carpets of Worth v Wyre Forest District Council (1991) ('Carpets of Worth') March, 1991 (Court of Appeal) the judge stated:

'As it directly prejudices landowners in the otherwise proper development of their land, an extension to the green belt should not be brought into effect unless it can be justified directly by those purposes for which the green belt is designed. There must, therefore, be an inhibition in extending a green belt so as to avoid sterilising unnecessarily neighbouring land ... just as much as reduction in the boundaries of the green belt, which would prejudice the purposes of that green belt, must be made only in exceptional circumstances. On this basis I think that the general concept of the advice in the circulars is that once a green belt has been established and approved as a result of all the normal statutory processes it must require exceptional circumstances rather than general planning concepts to justify an alteration. Whichever way the boundary is altered there must be serious prejudice one way or the other to the parties involved.'

The Local Plan proposes to change the Green Belt boundary in Ockham. It does not set out this change clearly and unambiguously in prose. It is done by reference to a 'Policies Map' from which one is supposed to infer the change.

The change is to make my garden hedge the new Green Belt boundary. An organic feature such as a hedge is impermanent and is not therefore a 'defensible' Green Belt boundary. Moreover the change in the boundary is a serious prejudice to me as a neighbouring landowner. My property has been in the Green Belt for 50 years and my development rights have been restricted accordingly - as have the rights of all the neighbouring landowners. I have been obliged to maintain the open character of the Green Belt. But now my neighbour, Wisley Property Investments Ltd, is to be suddenly freed from the constraints of the Green Belt and to be allowed to construct the third largest town in the borough within metres of my property around some 240 yards of my hedge and utterly change forever the setting of my house, a Grade II fifteenth century farmhouse and garden laid out in 1975 by Russell Page.
GBC is proposing to make this change without making a proper demonstration that the agricultural land adjacent to my property is a sustainable site for a new town and without setting forth ANY exceptional circumstances. This procedural irregularity shows complete disregard for planning law.

Summary

This letter sets out only a few of the many valid objections to the development of the site. It is little short of astonishing that this site has been taken forward into the local plan despite the numerous legally argued and factually evidenced objections already received by GBC as part of the Issues and Options consultation process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 1.png (103 KB)
2.png (37 KB)

Comment ID: PSLPS16/1412  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECTION: evidence base shows no sequential testing of alternative sites

Before selecting a site in the Green Belt for development the promoter, Wisley Property Investments Ltd, a Caymans company, and Guildford Borough Council have an obligation to establish that there are not other more suitable sites to develop outside the Green Belt. In other words, the developer and Guildford Borough Council should apply a 'sequential test'.

The evidence base does not evaluate alternative sites or show that agricultural land at the former Wisley airfield in the centre of the Parish of Ockham is suitable for development and 'sustainable'.

It is instructive to compare site 56, near Ash, with site 66 (agricultural land at the former Wisley airfield). Although the gross area of land at site 66 is much greater, on a net basis, after allowing for land which must be set aside for SANGS, for the Surrey Waste Plan allocation, and for roads and amenities it is in fact the same size or smaller than site 56. Despite the site being of comparable size when compared on a net basis the number of houses planned for at site 66 is over 2000 while only some 400 houses have been given permission at site 56. This illustrates both the potential for more housing at site 56 and the ridiculously high density of housing required at site 66 to cram over 2000 houses into such a small net area.

I set out below a comparison of the two sites. Any rational analysis of the two sites shows that site 56 is far more sustainable than site 66. For example site 56 is adjacent to a railway station, has existing access to severa l A and B roads. In addition there are a number of primary and secondary schools within walking or cycling distance of the site. This is one of many reasons for objecting to this local plan.
<table>
<thead>
<tr>
<th>Criteria</th>
<th>Land at Ash &amp; Tongham</th>
<th>Land at former Wisley airfield</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Metropolitan Green Belt This is a nationally recognised protective designation</td>
<td>No</td>
<td>Green Belt</td>
</tr>
<tr>
<td>2. Special Protection Area (SPA)</td>
<td>No</td>
<td>SPA - immediately adjacent; less than 400m</td>
</tr>
<tr>
<td>In March 2005, the government designated areas of heathland within the Thames Valley as the Thames Basin Heaths Special 12 Protection Area (TBH SPA) under the European Commission Birds Directive. Natural England believes that recreational use of the heaths arising from housing developments near to a SPA will disturb rare bird populations. As a result, all housing developments within five kilometres of a SPA are subject to stringent tests and impact assessments and housing development with 400m is prohibited.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Sites of Special Scientific Interest (SSSI)</td>
<td>No</td>
<td>SSSI</td>
</tr>
<tr>
<td>These are sites designated by Natural England which are considered to the best wildlife and geological sites</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Conservation areas</td>
<td>[ ]</td>
<td>Ockham Mill Conservation Area (downstream from site on Stratford Brook) Bridge End Conservation Area (below site and subject to surface water run-off) Ripley Village Conservation Area (subject to traffic deterioration)</td>
</tr>
<tr>
<td>Areas designated for their special architectural and historic interest.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. AONB</td>
<td>No</td>
<td>No - but views to and from</td>
</tr>
<tr>
<td>6. Scheduled Ancient Monuments</td>
<td></td>
<td>Yarne Grade 2 listed 1470 farmhouse; garden laid out by Russell Page 1975; immediately adjacent Upton Farm, Grade 2 listed 151 century farm; adjacent</td>
</tr>
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<td></td>
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<td>---</td>
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<tr>
<td><strong>7. Flooding</strong></td>
<td>Flood Zone 1 (low risk)</td>
<td>Flood Zone 1; but surrounding areas vulnerable to surface water run-off</td>
</tr>
<tr>
<td><strong>8. Scale</strong></td>
<td>87ha gross</td>
<td>114.7 gross</td>
</tr>
<tr>
<td></td>
<td>Less set aside for</td>
<td>Less set aside for</td>
</tr>
<tr>
<td></td>
<td>* public footpaths [ ]</td>
<td>* SANG: min 49.9ha</td>
</tr>
<tr>
<td></td>
<td></td>
<td>* Open spaces 21ha</td>
</tr>
<tr>
<td></td>
<td></td>
<td>* public footpaths 0.9ha</td>
</tr>
<tr>
<td></td>
<td></td>
<td>* new roadways 5.8ha</td>
</tr>
<tr>
<td></td>
<td></td>
<td>* traveller site, local centre, utilities etc 1.7ha</td>
</tr>
<tr>
<td></td>
<td>Net 8Sha est</td>
<td>Net 36.8ha</td>
</tr>
<tr>
<td><strong>9. Current use</strong></td>
<td>Agriculture</td>
<td>Agriculture:</td>
</tr>
<tr>
<td></td>
<td>Classification [ ]?</td>
<td>App 9.6 and ES vol 1 para 3.6.6</td>
</tr>
<tr>
<td></td>
<td>Best &amp; most versatile [?]</td>
<td>Applic no 15/p/00012:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Best &amp; most versatile land:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>45.8 ha (40%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Previously developed 16ha 14%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Countryside (grassland etc):</td>
</tr>
<tr>
<td></td>
<td></td>
<td>17.8ha (15%)</td>
</tr>
<tr>
<td><strong>7. Sustainability Ranking (Settlement Hierarchy May 2014)</strong></td>
<td>Ranked no 2/32</td>
<td>Ranked 31/32</td>
</tr>
<tr>
<td><strong>8. Sustainability score (Settlement Hierarchy May 2014)</strong></td>
<td>Ash &amp; Tongham urban area total facilities: 17</td>
<td>Ockham total facilities: 4</td>
</tr>
<tr>
<td>9 Total public transport score</td>
<td>Ash &amp; Tongham: 9</td>
<td>Ockham: 0</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>------------------</td>
<td>----------</td>
</tr>
<tr>
<td><strong>10. Railway links</strong></td>
<td>Ash station</td>
<td>Effingham Junction</td>
</tr>
<tr>
<td>Stations that are over a km walk from the village settlement have been given a score of 0 as they do not add to the settlements sustainability.</td>
<td>Immediately adjacent to nearest part of site</td>
<td>2.83km (1.76m) from nearest part of site</td>
</tr>
<tr>
<td></td>
<td>East Horsley S.Olkm (3.1Sm) from nearest part of site</td>
<td></td>
</tr>
<tr>
<td><strong>10. Schools (Settlement Hierarchy)</strong></td>
<td>Ash &amp; Tongham Score: 9</td>
<td>Ockham Score: 0</td>
</tr>
<tr>
<td><strong>11. Employment total score</strong></td>
<td>Ash: 9</td>
<td>Ockham: 0</td>
</tr>
</tbody>
</table>

### 56 Land in Ash and Tongham

<table>
<thead>
<tr>
<th>Site address</th>
<th>Land to the east of Ash and Tongham</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Ash and Tongham urban area</td>
</tr>
<tr>
<td>Ward</td>
<td>Ash South and Tongham,Ash Wharf</td>
</tr>
<tr>
<td>Ownership</td>
<td>Private (multiple)</td>
</tr>
<tr>
<td>Area (size)</td>
<td>87 ha</td>
</tr>
<tr>
<td>Existing use</td>
<td>Fields</td>
</tr>
<tr>
<td><strong>How was the site identified?</strong></td>
<td><strong>Considerations</strong></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td></td>
<td>• Currently Countryside beyond the Green Belt</td>
</tr>
<tr>
<td></td>
<td>• Greenfield</td>
</tr>
<tr>
<td></td>
<td>• Surface water flooding</td>
</tr>
<tr>
<td></td>
<td>• Flood zone 1 (low risk)</td>
</tr>
</tbody>
</table>

There may be other constraints specific to smaller areas of land within this site area.

There are planning permissions for new homes within this area of land, including a planning permission for up to 400 new homes.

<table>
<thead>
<tr>
<th><strong>Allocation</strong></th>
<th>Housing (C3)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>nmescales</strong></td>
<td>1-5 and 6-10 years</td>
</tr>
</tbody>
</table>

**Opportunities /commentary**

Whilst this area of land is within multiple land ownership, and may come forward for development at different times within the plan period, we expect significant regard to be had to the impact of development on the existing character of the area, and the infrastructure needs. New homes could be provided in this area (of which 45% will be affordable homes*).

*The planning permission granted for up to 400 new homes in this area will contribute 40% affordable housing.

<table>
<thead>
<tr>
<th><strong>66</strong></th>
<th><strong>Land at the former Wisley airfield</strong></th>
</tr>
</thead>
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<tr>
<td><strong>Site address</strong></td>
<td>Land between Ockham and Wisley common, Ockham</td>
</tr>
<tr>
<td>Location</td>
<td>New settlement</td>
</tr>
<tr>
<td>----------</td>
<td>----------------</td>
</tr>
<tr>
<td>Ward</td>
<td>Lovelace</td>
</tr>
<tr>
<td>Ownership</td>
<td>Private</td>
</tr>
<tr>
<td>Area (size)</td>
<td>69 ha</td>
</tr>
<tr>
<td>Existing use</td>
<td>Former airfield</td>
</tr>
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<td>How was the site identified?</td>
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<td>Considerations</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- 4.PNG (627 KB)
- 1.PNG (275 KB)
- 3.PNG (620 KB)
- 2.PNG (209 KB)

Comment ID:  PSLPS16/3342  
Respondent:  8749121 / George Paton  
Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
 OBJECTION Site allocation A35: 'land at former Wisley Airfield'

- Failure to comply with GBC's Probity in Planning Code of Conduct and the Nolan Principles
- Regulatory Capture: colluding with the owner of this site in order to change local planning law by including this site in the draft local plan without justification on the basis of sound planning principles, in contravention of planning law, and in contravention of GBC's Probity in Planning Code
- Misrepresentation of the facts concerning this site
- Predetermination of the decision to promote this site in the Local Plan and to remove it from the Green Belt

1. Failure to comply with GBC's Probity in Planning Code of Conduct and the Nolan Principles

[Response has been redacted due to statements being considered potentially defamatory, derogatory, inflammatory or offensive in nature.]

During the compilation of the draft local plan there have been multiple and serious breaches of GBC's Codes of Conduct.

It is astonishing that a developer has managed to achieve pride of place for its site in both the Issues and Options paper and in the local plan as a site for a new town - despite relevant evidence and legal argument in support of that site being against inclusion.

The owner of Site A35 is a Cayman Islands Company called Wisley Properties investments - which is a holding company for various subsidiaries.[Response has been redacted due to statements being considered potentially defamatory, derogatory, inflammatory or offensive in nature.] WPI is fronted by a conservative Councilor from the Vale of White Horse called Michael Murray.

The Probity in Planning Code of Conduct can be found here:

The Code deals explicitly with 'Pre-Application Discussions (page 4)'. The first three bullets define a clear process.

Councilors will only be involved (primarily for fact-finding) in pre-application discussions on major schemes when a specific forum has been arranged by officers for that purpose.

- In complex or contentious cases, at least one planning officer will be

- A meeting note will be taken by planning officers and placed on the relevant file. In some cases, this might be a previous planning file, in others it might be the general file for the area. Some pre-application discussions are undertaken on a confidential basis and these will be placed in a confidential envelope on the appropriate file.

- It will be made clear that the planning officers are giving provisional views (based on the development plan and up-to-date government guidance); that no decisions are being made and that decision-making rests with councilors at Planning Committee or by the relevant officer under delegated powers.

- Similar issues apply to the development of planning policy. There may be occasions where owners, developers or other interested parties will wish to discuss with councilors aspects of emerging policy in the development plan and other policy

In July, 2014 I requested disclosure of the minutes of meetings between GBC and WPI pursuant the GBC's Probity in Planning Code of Conduct. No response was forthcoming. I therefore complained to the Information Commissioner. Following that complaint I received a response over six months later dated 17 February, 2015 (attached). The council chose to use a public interest defense in order not to disclose the information. It appears that GBC officials themselves took minutes of the meetings - as required by the Probity Code.

There remains no explanation of how the Council managed the conflicts of interest involved in providing pre-application advice and also in acting at a statutory planning authority with quasi-judicial powers. For example no information has
been given as to whether the same personnel were involved in giving the applicant advice and also involved in making recommendations concerning whether the application site was sustainable or whether a subsequent planning application should be refused or recommended.

The Probity in Planning Code of Conduct states that Councilors should 'restrict pre application advice to procedures and policies only' It is clear that Council officials went far beyond restricting pre-application advice to procedures and policies only'.

At best I suspect procedural irregularities and at worst breaches of the Codes of Conduct. Subsequent to the publication of planning application 15/P/000 12 I requested copies of the minutes of the meetings attended by Savills on behalf of WPI as detailed in the planning application. Pursuant to that request I received copies of some but not all of the relevant minutes. Those minutes show that GBC and WPI engaged in a joint strategy to include the site in the local plan with a view to making development possible. GBC officials also advised on where to hold public consultations (in Guildford rather than in Ockham) and how to approach other public bodies such as Natural England.

1. Regulatory capture: colluding with the owner of this site in order to change local planning law by including this site in the draft local plan without justification on the basis of sound planning principles, in contravention of planning law, and in contravention of GBC's Probity in Planning Code.

A35 has been promoted as, inter alia, the 'only' site in the Guildford Green Belt which does not satisfy the criteria for inclusion in the Green Belt and the only sustainable site for a new town in the entire borough. The basis for these statements is not set out in the draft local plan and the evidence base is not consistent with these statements.

GBC has neither maintained a proper distance between itself and the developer nor adopted a critical attitude to the developer's promotional claims.

The objectivity and impartiality of the planning department in relation to this site is in question. I am reliably informed by a local resident who was present that when the Local Plan proposals were 'road showed' to the public that Mr Michael Murray was allowed to promote the concept of a new settlement on the site to the public. The blatant conflicts of interest between the developer as promoter and GBC as regulator were not disclosed to participants.

GBC's conduct appears to be a classic example of 'regulatory capture'. The quote below from Wikipedia regarding 'regulatory capture' and 'captured agencies' is relevant:

Regulatory capture

From Wikipedia the free encyclopedia

Regulatory capture is a form of political corruption that occurs when a regulatory agency, created to act in the public interest, instead acts in accordance with the interests of those that dominate the industry or sector it is charged with regulating. Regulatory capture creates an opening for firms to behave in ways injurious to the public (e.g., producing negative externalities). The agencies are called "captured agencies".

The planning dept of GBC appears to be colluding with the developer to have this site included in the local plan without any proper analysis of a) the need for a new town b) the relative suitability of other sites in the borough c) the sustainability of this site d) the effect on the SPA at Ockham Common e) the effect on the Heritage of Ockham.

3. Deliberate misrepresentation of the facts concerning this site

The facts about this site have not been accurately presented. Important elements have not been subject to proper analysis.

The effect of the proposed 'new town' on the environment and natural environment has either not been considered at all or inadequately. This is contrary to the requirements of The Listed Building and Conservation Areas Act 1990 and NPPF para 126 and 132.
The effect on local infrastructure has either not been considered at all or adequately. The evidence base gives inadequate consideration to whether local infrastructure has any spare capacity for more houses - beyond what is needed to meet local demand. Para 162 of the N PPF is not properly complied with.

4. Predetermination

On 12 May, 2016 the Leader of the Council, Mr Paul Spooner, was directly quoted in an article in the Surrey Advertiser headed 'Encouragement for developer working to clear airfield hurdles' as follows:

"for us it is simple. Do we, during the plan period of twenty years 2013 to 2033 believe that a sustainable community can be delivered in Wisley? If the answer is yes it will stay in the local plan, if the answer is no it has to come out. I am convinced subject to a whole bunch of things coming together we should be able to deliver a sustainable community at that site to assist in terms of the objectively assessed need. The application that came forward from Wisley (WPI) clearly for me and all the other members did not deliver on that aspiration and hence, as an application, it failed. If they come back

with one or two tweaks, it would fail again. So I think there is a fundamental need in terms of improvement to that application, but will they do that during the plan period? If they don't, I believe someone else will."

That article appeared after 15/P/00012 was unanimously refused by the Planning Committee on 6 April. In the same edition of the Surrey Advertiser the developer took out double full page advertisements promoting a new town on the site.

The Probity in Planning Code of Conduct states that "Council/ ors should avoid making it known in advance of the Committee or similar meeting whether they support or oppose the proposal."

Mr Spooner's comments express a strong opinion that the obstacles to developing a new town on this site can be overcome and will be overcome over the next twenty years. That strong expression of opinion is clearly contrary to the recommendations of the Probity in Planning Code of Conduct. The use of the pronoun 'we' in the sentence 'we will be able

to deliver a sustainable community' and the use of the word 'aspiration' -suggesting that it is GBC"s aspiration - at best shows an inappropriate lack of impartiality and at worst a clear desire as Leader or the Council and Lead Member for the Local Plan to promote development on the site.

Of the 'whole bunch of things coming together ' one critical pre-condition is the removal of the site from the Green Belt - which was one of the reasons for refusing application

15/P/00012. The statements follow the clear collaboration shown in the minutes of the meetings between Savills and GBC to use the local plan process and the OAN as the necessary 'exceptional circumstances ' required to justify removing the site from the Green Belt.

Taken together with GBC's conduct over the past three years the statements are further evidence that GBC has predetermined that this site should be removed from the Green Belt and deliberately commissioned consultants to produce reports which could be used as evidence to further that objective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Local Plan Consultation

Site allocation A35 formerly referenced as site no 66: 'land at former Wisley Airfield'

OBJECTION: evidence base shows no sequential testing of alternative sites

Before selecting a site in the Green Belt for development the promoter, Wisley Property Investments Ltd, a Caymans company, and Guildford Borough Council have an obligation to establish that there are not other more suitable sites to develop outside the Green Belt. In other words, the developer and Guildford Borough Council should apply a 'sequential test'.

The evidence base does not evaluate alternative sites or show that agricultural land at the former Wisley airfield in the centre of the Parish of Ockham is suitable for development and 'sustainable'.

It is instructive to compare site 56, near Ash, with site 66 (agricultural land at the former Wisley airfield). Although the gross area of land at site 66 is much greater, on a net basis, after allowing for land which must be set aside for SANGS, for the Surrey Waste Plan allocation, and for roads and amenities it is in fact the same size or smaller than site 56. Despite the site being of comparable size when compared on a net basis the number of houses planned for at site 66 is over 2000 while only some 400 houses have been given permission at site 56. This illustrates both the potential for more housing at site 56 and the ridiculously high density of housing required at site 66 to cram over 2000 houses into such a small net area.

I set out below a comparison of the two sites. Any rational analysis of the two sites shows that site 56 is far more sustainable than site 66. For example site 56 is adjacent to a railway station, has existing access to several A and B roads. In addition there are a number of primary and secondary schools within walking or cycling distance of the site. This is one of many reasons for objecting to this local plan.

Comparison of sites 56 and 66: Land in Ash & Tongham vs Land at former Wisley Airfield

<table>
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<tr>
<th>Criteria</th>
<th>Land at Ash &amp; Tongham</th>
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<tbody>
<tr>
<td>1. Metropolitan Green Belt This is a nationally recognised protective designation</td>
<td>No</td>
<td>Green Belt</td>
</tr>
<tr>
<td>2. Special Protection Area (SPA)</td>
<td>No</td>
<td>SPA - immediately adjacent; less than 400m</td>
</tr>
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</table>

In March 2005, the government designated areas of heathland within the Thames Valley as the Thames Basin Heaths Special Protection Area (TBH SPA) under the European Commission Birds Directive. Natural England believes that recreational use of the heaths arising from housing developments near to a SPA will disturb rare bird populations. As a result, all housing developments within five kilometres of a SPA are subject to stringent tests and impact assessments and housing development with 400m is prohibited.
3. Sites of Special Scientific Interest (SSSI)
These are sites designated by Natural England which are considered to the best wildlife and geological sites

4 Conservation areas
Areas designated for their special architectural and historic interest.

5. AONB
No No - but views to and from

6. Scheduled Ancient Monuments
Yarne Grade 2 listed 1470 farmhouse; garden laid out by Russell Page 1975; immediately adjacent Upton Farm, Grade 2 listed 1st century farm; adjacent

66 Land at the former Wisley airfield
Site address Land between Ockham and Wisley common, Ockham
Location New settlement
Ward Lovelace
Ownership Private
Area (size) 69 ha
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- capture9.JPG (116 KB)
- capture11.JPG (189 KB)
- capture10.JPG (155 KB)

**Comment ID:** PSLPS16/3436  **Respondent:** 8749121 / George Paton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Complaint**

I am writing to draw your attention to this double page advertisement in the Surrey Advertiser and to complain that

- The advertisement headline is misleading
- many of the written statements are factually inaccurate or false
- the diagrams/graphics/photos are false and/or misleading
- overall, the advertisement presents a false and misleading impression of i) the existing site

ii) proposed new development

- the sustainability of the new
  1. Timing and context of the advertisement

The advertisement has been placed in the interval between the unanimous rejection of the advertiser's application for planning consent by Guildford Borough Council's (GBC) Planning Committee on 6 April this year and the issue of a new draft local plan by the Council.

GBC's reference number for the planning application is 15/p/00012. The application documents and well in excess of 2,000 objections can be found on GBC's planning website: [http://www2.guildford.gov.uk/publicaccess/](http://www2.guildford.gov.uk/publicaccess/)
The applicant is now seeking to persuade Councillors to retain its site within the draft local plan. The advertisement is clearly an attempt to influence decision makers (ie borough councilors) by means outside the regulated planning process at a particularly sensitive time.

1. Factual inaccuracies

The following written statements in the advertisement are factually wrong and/or misleading:

- "It has a consented direct connection to the A311 [this is the advertiser’s bold lettering - in green in the advert]

Planning application 15/p/00012 applied for permission to access the A3. That application was unanimously rejected by the planning committee.

The only vehicular access to the site at present is via an entrance on Ockham Lane. That entrance was created primarily for farm vehicles for farming purposes. There are no buildings or premises on the site. That entrance is kept locked. Ockham Lane is an HGV restricted minor road.

The former vehicular access at Elm Lane - which leads from the A3 has been permanently closed with a bund for many years.

Access via Elm Lane to and from the A3 for large volumes of traffic has consistently been refused by the Highways Agency because of the dangers caused by traffic emerging onto the fast flowing three lane strategic road network. In short there is currently NO access to the site to or from the A3 via Elm Lane. This can be verified by visiting the site and viewing the bund and by asking Highways England.

So the only 'consented direct connection to the A3' that the advertisement can relate to is that in the report of the Planning Inspectorate in 2010 granting permission to use some 16ha of the site for a waste composting facility. The Inspectorate report is attached for your information. The permission was subject to the 37 conditions set out in Annex 3 of the attached document. Relevant parts of the document are highlighted in yellow. Note in particular conditions 10-15 concerning highways and access. These conditions explicitly state that the waste composting development may not proceed unless and until an access to the A3 via the Ockham interchange has been built. Neither the development in question nor its road access have ever been built.

The statement in the advertisement is that 'it', meaning in the context of the advertisement the whole of "Wisley Airfield," has a consented direct connection with the A3". That is false and misleading. The whole site does not have any consented direct connection:

1. The consented connection is exclusively for a waste composting facility - covering at most some 16ha out of a total of 115ha
2. The consented connection is not "direct". It is a connection via a new road connected in the first instance to the roundabout below the That roundabout affords access to ONLY the northbound carriageway of the A3, not to the whole A3 ie both the northbound and southbound carriageways
   - The consented connection is for a very limited number of vehicle These are specifically HGVs serving the facilities and the movements must not exceed 36 two way movements per day. The planning application, by contrast, proposed to build 2,068 dwellings.

It is reasonable to assume an average of two cars per household. If further traffic is added to the total for access two and from two schools and still further traffic caused by the closure of four local lanes the volume of traffic ensuing from this development is very material. It is highly misleading to imply that the whole site has 'consented direction connection to the A3' for in excess of 5,000 cars when currently there is no access whatsoever and the only permission is to access a small part of the site for a specific purpose by no more than 36 HGVs per day. The statement in the advertisement is therefore false and misleading.

The advertiser's website (to which readers are drawn by the advertisement) makes further exaggerated or false claims regarding the transport links to this site:
The Airfield is very well connected. It's got a direct, consented connection to the A3 and is within five miles of nine mainline railway stations. Effingham junction is just a six minute cycle away.

As set out above, the airfield, which is not an airfield and has not been since 1980, has NOT "got a direct consented connection to the A3".

Nor is it "within five miles of nine mainline railway stations". The only mainline railway stations are Woking and Guildford.

Elm Lane to Woking railway station via A367: distance by road Gmiles; return distance by road via A367 8.Gm (All distances from Google maps)

Elm Lane to Guildford railway station via A3:8.8m; return journey 11.lm

Secondary railway stations for slow, stopping trains are Effingham Junction, Stoke D'Abernon, East Horsley and Clandon - all on the same branch line; and Worplesdon and West Byfleet on the Woking line.

Elm Lane to Effingham Junction by car: 3.4m Elm Lane to Stoke D'Abernon by car:6.3m Elm Lane to East Horsley by car: 3.Gm

The statement about the site's distance from nine mainline stations or any stations at all is false and misleading. In fact, given the number of suburban railway stations in this part of Surrey it is not legitimate to argue that it is located any closer to railway stations in general than thousands of other sites.

Nor is the site a 6 minute bicycle ride away from Effingham Junction - the nearest station. The site is at least 2.8miles from the nearest railway station, Effingham Junction. The route has a significant hill and takes at least 19 minutes by bicycle. Below I attach a screen print from the Surrey Interactive Map website. The relevant distance is 2.87 miles.

If one cycled at an average of 6mph it would take 29 minutes to cycle to Effingham Junction station:

2.87/6 mph x 60mins = 29minutes

Supposing one cycled it at Omph - it would still take 17 minutes. To do it in 6 minutes one would have to go an average speed of 28.7mph. It is not credible for an ordinary or average cyclist to make that journey in normal conditions in just six minutes. I attach an article written by the Surrey Advertiser. For that article the Surrey Advertiser sent its photographer to the site and he followed me from the middle of the site to Effingham Junction station and verified a) that I did not stop or diverge from the route b) bicycle slowly c) take less than the stated time.

3.2 The site is described as containing the "biggest brownfield site in the Guildford Green Belt". The analysis of the area of the site in a brochure produced by the advertiser is as follows:

Note that the total area of the site is over 283 acres or some 114.7ha. The area of concrete and hardstanding is therefore only 24% of the total. The planning application contains expert reports on the quality of the agricultural land which state conclusively that it is all good quality land of Grade 3 and above, most of it being Grade 3a and Grade 2.

It is misleading to describe the totality of the site by reference to only 24% of it - when the remainder of the site comprises 45 ha (112 acres) of 'Best and Most Versatile' agricultural land which has never been developed and which has been farmed continuously for hundreds of years.
"Brownfield" is a synonym in planning terminology for 'previously developed land', a term defined in the National Planning Policy Framework.

The advertiser’s website states:

Wisley Airfield has a long and distinguished past as a fully operational military and civilian airfield.

This is misleading. It has never been a civilian airfield. Throughout its period of operation it was leased by Vickers/British Aircraft Corporation/Bae for the purposes of testing and transporting planes from its factories near Weybridge. In 1980 there was a public enquiry to decide whether the runway could be used as a civilian airfield. The proposal was decisively rejected.

Even the statement that it was a 'fully operational military airfield' is misleading because the airfield was never an RAF base or used directly by the armed forces. It was an airfield used by a military aerospace contractor - Vickers - an aircraft manufacturer not an operator of a military capability.

The land at the former Wisley airfield was requisitioned in 1942 for 'wartime purposes' on condition it was restored to its prewar agricultural use after the war. (My grandmother was among the leaseholders who gave up part of the land within her lease.)

The wartime purpose was to serve as a grass airstrip for Vickers to use to fly out aeroplanes it was building near Weybridge. Agriculture around the grass airstrip continued throughout the remainder of the war. After the War the land was not immediately relinquished and Vickers continued to use it to test and fly out planes it was building, building a concrete runway in 1950. All flying ceased in 1972 and the site was sold back to its pre-war owner - the Ockham Park Estate - in 1980. It was never an RAF base. It was never a public airfield. It is not correct to describe the land as a 'derelict' airfield.

The use of the land for aerospace purposes by Vickers and its successor companies (finally British Aerospace) ended in 1972. When it was sold to its pre-war owner in 1980 it was totally decommissioned. All the hangars were removed. No buildings remain. The runway should have been removed but was allowed to remain solely to save HM Government the cost of removing it.

The remaining runway is crisscrossed by multiple public rights of way - all restored when the airfield was decommissioned. These could not exist if the runway served any remaining aerospace use.

3.3 "[the site] ...is just minutes from local train stations using one of the planned frequent bus services" bold lettering used by the advertiser - in green in the advert.

The nearest train station is at Effingham Junction, which is 2.6 miles from the centre of the site. There are no public footpaths and no bus services along any of the road connecting the site and the railway station.

The site is described as 'just minutes from local railway stations'. In fact the site is 2.6 miles from the nearest railway station, Effingham Junction. Evidence to support the viability of a planned frequent bus service does not exist. No bus operator has agreed to operate any such route on a current or prospective basis.

The statement that the site is 'just minutes away from local railway stations' is at best a gross exaggeration. At worst it is completely misleading - because there is currently no spare parking capacity at any local railway stations and current services to London are at or near capacity.

3.4 "Over 50% of the site will be green space"

This statement is especially misleading. 'Over 50% of the site will be green space' creates the misleading impression that this will be a low density development. In fact because half the site is within 400m of a Special Protection Area for endangered species, half the site must be set aside for a Site of Alternative Natural Greenspace or SANG. The number of dwellings per hectare on the remainder of the site is extremely high at up to 100 dwellings per hectare, similar to those found in the most densely populated parts of London like Islington.
The green space proposed for the development is described as "a huge new parkland bigger than the County Showground, Stoke Park". The advertisement states: "Creates the biggest park in Guildford Borough". [Bold lettering used by the advertiser.]

This is a highly misleading statement. A SANG is a defined term. It is defined in the legislation creating the SPA. Attached is a Natural England document setting out SANG guidelines. There are material constraints on the use of a SANG which do not apply to an ordinary public park in a town. It is highly misleading to describe a SANG as a park and to compare it to a park in central Guildford surrounded on all sides by development.

Compare the plan in the advertisement with the plan shown on the linked website and proposed to GBC:

The plan in the advertisement is cut in vertically in half (roughly but not exactly by area). However the actual development is divided roughly horizontally ie from West to East. The horizontal division of the site is caused by the northern half of the site being adjacent to the SPA. The narrow shape of the developable site together with the density of dwellings was expressly mentioned as one of the factors in refusing planning consent for 15/p/00012.

The diagram presented in the advertisement is particularly misleading because the northern half of the site cannot be developed at all.

- The Advertisement headline states:
  "A sustainable new community for Surrey"

This headline is also misleading. It presents the development as 'sustainable'. However planning permission for a development on the site has just been unanimously refused in large part because the proposal was NOT sustainable. For example Highways England stated that the development was likely to have a severe negative impact on the Strategic Road Network.

The entire site is situated exclusively within the Parish of Ockham. The site is not in or part of Wisley and does not communicate with Wisley in any way. The Settlement Hierarchy in the Guildford draft local plan lists Ockham as the second least sustainable site for a new development in the whole borough. Ockham does not have a shop or any significant facilities. A new development in the centre of Ockham would be completely dependent on car transport - yet the local roads are entirely unsuitable for a development of this size - which would be third largest in the borough after Guildford and Ash & Tongham.

3.7 The advertisement states:

"Delivers more than 2,000 new homes,fast" [bold lettering as used by the advertiser - in green in the advert]

It is incorrect and misleading to state that 'more than 2000 new homes' can or will be delivered "fast". Thames Water, for example has stated (its letter is on the GBC website) that there is insufficient sewage processing capacity, that up to three years' lead time would be required and that all works would be subject to funding. It is also likely that development could not begin until road access to the A3 had been completed. All these factors make it extremely unlikely that houses could be provided quickly or at all within a 5 year horizon. It is certain that the entire figure of 2,000 homes would not be
developed 'fast' because the plans attaching to 15/p/00012 proposed to spread the development over 15 years. The use of the adjective 'fast' in relation to all 2,000 homes is highly misleading in the context of a development which might not start for five years and might not complete in less than 15 years.

It shows that cumulative housing delivery by 2020 is only 377 houses. That figure itself is aspirational rather than realistic or contracted. No planning permission has been achieved and is unlikely to be achieved before the Local Plan process is complete - which is unlikely to be before the end of 2017.

Political influence

This development is promoted by a local politician called Mr Michael Murray, who is borough councillor in Oxfordshire. His details can be found on the Vale of White Horse website which shows that he is responsible for its Local Plan. Mr Murray is also an officer of Causeway land - the promoter of the development.

The purpose of the advertisement is clearly to influence the political process of adopting a new local plan in Guildford. As such it was important that the public and Guildford Borough Councillors should have been given accurate facts in the advertisement presented in a fair manner taking full account of the context and the constraints on the site. Instead the advertisement shows a casual disregard for the true facts.

The photographs of the site are deliberately unflattering. The main photographs are taken from a very considerable height in the air. These give a misleading impression of the site - because the runway cannot be seen from any of the adjacent land - except from a small area on Hatchford Hill. The photos give no indication of the designations of the adjacent land. They do not mark the Special Protection Area, The Site of Special Scientific Interest, The Sites of Nature Conservation Interest or the Conservation Areas and Listed Building adjacent or near to the site. They do not show the part of the site which has planning permission for a waste composting facility and which is set aside for the Surrey Waste plan. The photos imply that the whole site could be built on. The advertisement implies that the developer is somehow generously electing, out of its innate sense of public service and beneficence, to dedicate half the site to the purpose of providing the lucky citizens of Surrey with the biggest 'park' in the county. Nothing could be further from the truth. In fact the developer is not creating a 'park' at all. It is creating a SANG as a legal obligation in order to comply with environmental legislation.

This map (below), taken from the Surrey Interactive Maps website, shows relevant features which the advertiser has chosen to ignore. Note in particular the proportion of the site allocated to the Surrey Waste Plan, which cannot be used for housing, and the SSSI and the footpaths.

Note that no access to the A3 exists or is shown on the map. This land is no different in terms of access to the A3 from any other farmland adjacent to the A3 along its length from London to Portsmouth - except of course for the fact that it is designated as part of London's Green Belt.

2. Conclusions

The advertisement contains a number of false and misleading statements regarding the access of the site to and from the A3. It describes the whole site as derelict and brownfield when at the very most 24% of the land could be so described. It gives the impression that all of the 'brownfield' land could be developed for housing. In fact some 15% out of 24% is some 60% of it is already allocated for the Surrey Waste Plan - and so is not available for housing. And a significant proportion of that is in any case within 400m of the SPA and so by Jaw impossible to develop for housing. The advertisement states that half the land will be turned into a public park - when in fact it will be land used to create a
SANG to protect the SPA to the north. It states that the site will create a 'sustainable community' when in fact the site is far from sustainable, has no community and will not have a meaningful community for several decades.

The editorial department of the Surrey Advertiser is well aware of the issues surrounding the description of the site. It has published many articles and letters on the subject over the last two years. It would appear that the commercial interests of taking advertising revenue have over ridden an obligation to fair and accurate information. In view of this the Surrey Advertiser should make available space for Ockham Parish Council and other local interest groups to correct the false and misleading impression created by this advertisement.

Enclosures:

- Double full page spread advert in Surrey Advertiser, 13 May, 2016
- 2010 Inspectors' Report on Waste Composting facility on former Wisley airfield
- GBC Officer's report recommending refusal of planning permission - 6 April, 2016
- Guidelines for the creation of SANGs
- Surrey Ad article on cycle times to Effingham Junction railway station
- Letter from Thames Water to GBC
- Surrey Advertiser articles concerning the advertiser's claims

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Capture4.JPG (201 KB)
Capture.JPG (91 KB)
Capture5.JPG (116 KB)
Capture2.JPG (100 KB)
Capture3.JPG (116 KB)
Capture1.JPG (166 KB)
LP2016 Wisley 1979 G B Paton.pdf (1.2 MB)
LP2016 Inspectors report G B Paton.pdf (5.0 MB)
LP2016 Surrey Ad Article G B Paton.pdf (1.1 MB)
LP2016 Wisley Airfield Article G B Paton.pdf (2.3 MB)
LP2016 Fraud Article G B Paton.pdf (1.5 MB)

Comment ID: PSLPS16/3932  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The obligations of GBC to regulate development
   o requirements of the National Planning Policy Framework (NPPF)

Conservation of heritage assets 'in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations' is a 'Core Planning Principle' set out in NPPF para 17. 'Housing should be located where it will enhance or maintain the vitality of rural communities' - NPPF para 55. The LPA 'should require an applicant to describe the significance of any heritage assets affected, including any contribution made to their setting' (NPPF 128). The LPA should 'avoid or minimize conflict between the heritage asset's conservation and any aspect of the proposal (NPPF 129). 'Substantial harm to or loss of a grade II listed building, park or garden should be exceptional' (NPPF 132).
1.1 English Heritage Guidance: The Setting of Heritage Assets

English Heritage has published guidance on the setting of Heritage Assets from which the extracts below are taken:

2. Physical setting and context

The designation of site A35 as a strategic development site has profound implications for the character, setting and context of Ockham, itself a heritage asset, and for the individual heritage assets within it. The proposed development would do the parish and its heritage assets substantial and permanent harm. There are no measures significantly to reduce that harm.

The designation implies that development on this site is 'sustainable'. The principal argument made for its sustainability is its size. The planning statement for the planning application 15/P/000 12 states at para 1.14 "to demonstrate the critical mass created, on completion, the new village settlement will be the third largest settlement in the borough, exceeded only by Ash/Tongham and Guildford Town."

However the size of the development is the factor that causes most of the harm to the parish and its heritage assets. The imperative for size, without which the development is unsustainable on GBCs criteria (see s22 of Vol. V of the Green Belt and Countryside Study), causes the development to encroach on most of the constituent settlements that make up the parish of Ockham - especially Martyr's Green, Elm Corner and Bridge End. Rather than address this issue the proposal merely denies the existence of the problem. In a sense it has no choice but to ignore the problem because it can provide no remedy apart from making the development smaller which, in turn, would make it unsustainable. The developer cannot acknowledge that the site is too small because that invalidates the core hypothesis that the development is 'sustainable'. The developer cannot acknowledge that the development is too large because that validates the harm that the development causes to the heritage of Ockham and the Special Protection Area (SPA). The facts conflict with the application thesis and the exegesis is intellectually dishonest. The site is too small for development to be sustainable and allows no possible scope for future expansion.

2.2 The setting of Ockham and its parish

Rather than address the historical and geographical reality of Ockham as an integrated whole, the planning application seeks to split it into small units and then to claim that the units are either not part of or connected with Ockham (e.g. Martyr's Green) or that the effect on various of the parts has no effect on the whole (e.g. the Ockham Conservation areas). This false picture is accentuated by the constant repetition of various claims that present a misleading picture of the site. It is constantly repeated that the site is in Wisley whereas all of it stands in the parish of Ockham, that it is an 'airfield' (although all flying ceased in 1972 over forty years ago) and that it is 'brownfield' (even though only a small part (c27ha of which 17ha is already set aside for the Surrey Waste Plan) of it meets that definition). Other so-called facts are presented in a misleading way. It is claimed on the one hand that there is 'permissioned access' for the development onto the A3 while on the other hand such permission as exists is for a completely different project (a waste processing project) and this application expressly states that the applicant will seek to cancel the historic permission. Real facts such as the existence of the historic bridle ways and footpaths are distorted into justifying tenuous claims to sustainability. The fact that the footpaths mainly link the settlements of Ockham with each other and with their Common and that the proposed new 'urban feature' between all the settlements will do them great violence are all ignored.

The historic landscape characterisation 'is not considered [by Savills] to be of intrinsic significance or to contribute to the significance of the heritage assets with which it is associated:
Historic Landscape Characterisation

- The Application Site lies in an Historic Landscape Character area which is characterised by the Surrey Historic Landscape Characterisation survey as lying mainly within disused airfield with small parts of the south-western area lying within miscellaneous valley floor fields and pastures and medium to large regular fields with wavy boundaries (late medieval to 17th/18th century enclosure). The historic landscape character of the Application Site and its surroundings is not considered to be of intrinsic significance, or to contribute to the significance of the heritage assets with which it is associated.

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This assessment ignores multiple elements of the Landscape including:

- The public footpaths which exist in order to connect the various settlements of Ockham with each other and with their Com mon
  - There is a very good reason why the historic settlements of Ockham are located south of the Application It is that the Application Site is high ground and extremely exposed to the prevailing south westerly winds. Historic settlers have therefore sought the shelter of lower ground or tree cover.
  - The interconnectedness of the Heritage Assets with the land which has been shaped by the people who lived in these farm houses over the centuries.
  - The fact that the former runway (which is considered to 'degrade' the site) has no visual impact on the heritage assets and cannot be seen from outside the airfield except from the.
  - The fact that the runway is a small part of the overall land parcel - as little as 15% of the.
  - The description of the former airfield land is self-contradictory:

11.3.43. Due to the historic use of the Application Site, the existing land use does not relate to the other rural pressures, however there is some evidence of fragmentation and subdivision of fields for equestrian use immediately south of the Application Site.

11.3.46 The setting of Ockham end its relationship to the surrounding countryside should be retained.

11 3 48 The long open character of the airfield contrasts with the surrounding parkland and agricultural landscape as result of the removal of all traditional boundary hedges and trees during the airfield construction. The Application Site subsequently has few of the key characteristic features of the Ockham and Clandon Wooded Rolling Claylands Character. The linear Application Site is well enclosed by woodland across its north, west and southwest boundaries. with weaker hedges bordering the east and southeast boundaries with Old Lane and Ockham Lane. Its scale, linear and featureless characteristics contrast with the typical smaller scale enclosed field patterns of the surrounding countryside.

  - The application as a whole seeks to represent the airfield land as disconnected from the adjacent This misrepresents the reality
  - The cause of the dilapidations of the hedges around the land at the former airfield is the direct responsibility of the developer and its predecessors in title which have failed to maintain them.
Ockham does not have one central nucleus like many villages. It is a dispersed group of farming settlements historically unified by the Ockham Park Estate and Ockham Church.

1. The setting of Yarne and Ockham End in Martyr's Green

   • Historical geography of the property

Yarne, like Upton Farm, is a fifteenth century farm house. For many years until its sale at auction in 1958 Yarne formed part of the Ockham Park Estate. Until 1900 the property was a farm known as Lara Farm working the adjacent land which formed part of the Estate. Around 1905 the property was extensively modernised by the Estate: a northern extension was added and the southern front was substantially modified on plans thought to have been drawn up by Lutyens.

The historical setting of Yarne and the other farmhouses at Martyr's Green - Upton Farm, Pound Farm and Blackmoor Farm - is rural and agricultural. Farming and common historical ownership within the Ockham Park Estate over many centuries is an integrating and unifying factor creating a common setting for all these heritage assets.

Martyr's Green and May's Green have formed part of the parish of Ockham for many centuries. Closure of Ockham Lane and the introduction of the third largest urban concentration of houses in the borough will destroy Ockham's heritage and geographical integrity.

The geographical and cultural setting of the property is closely tied to the land. The current curtilage and much of the garden was established before WW 1. The house is positioned with its narrow end facing the southwest. The first builders oriented the house like this to minimise exposure to the strong south westerly winds blowing across the open landscape to the west. The predominant feature of the setting and the garden is its openness with views of the western horizon extending across twenty miles over and beyond Woking. These views have existed since the land was first cleared for farming - before the Norman Conquest. This extensive east-west aspect formed by a sandy ridge and the fortuitous crash landing of a bomber in WW2 were the reason it was chosen as the location of a grass airstrip in WW2.

Before WW2 the property was let by Ockham Park Estate with adjacent land to the West as shown by the pink shaded area on the 1927 lease plan:

My grandmother took over the lease of the property in 1932 and continued to hold the field to the west until it was commandeered with other parts of the Ockham Park Estate to form the grass runway along the ridge of the land several hundred metres further west. It was a condition of the requisition of the land that it would be restored to its previous agricultural use after the war.

I have known this agricultural land all my life and to my certain knowledge the adjacent agricultural has never been 'previously developed'.

When the airfield was sold under the provisions of the Crichel Down Code in 1980 to the heir of the original freeholder (the Ockham Park Estate) the leaseholders did not recover their leases.

In 1975 the garden at Yarne was re-designed by Russel Page, perhaps the most renowned twentieth century British garden designers. The back (North) garden was designed with a Westward facing aspect - directly towards the application site. The uninterrupted Westerly views across the application site towards Little Upton, Bridge End Farm and Woking would be completely obliterated by the creation of a new town.
• Assessment of the setting of Yarne in planning application 15/P/00012

Sections 10 and 11 of Environmental Statement (prepared by Savills) attached to the planning application refer to the setting of Yarne and to the impact of the development on Yarne.

In para 10.3.62 it is stated that, ‘The application site is considered to make a minor contribution to the setting of Grade II listed Yarne...’. The consideration given to the setting of Yarne is wholly inadequate and misleading.

1. The western boundary of Yarne is immediately alongside the development site. The western boundary with the site is some 200 yards long. The northern boundary is 40 yards long. This may be the longest boundary of curtilage of any heritage asset with the development site. Nowhere is this set out in planning application S/P/00012. This was drawn to the attention of the developer's representative, Mr Michael MmTay, a conservative councillor, at the roadshow on the runway intended to promote the development. He offered to provide screening for any properties along the northern edge of the Application Site but refused to give any explanation as to why no screening was proposed for Yarne.

The planning application seeks to minimise the effect of the development on Yarne and Martyr's Green. For example at para 11.3.28 it states:

11.3.28. The northern extents of Martyr's Green lie 0 further 400m east.

This is a blatant falsehood. Yarne’s curtilage is right next to the development. The property itself is within 30 yards of the development. The field known as Martyr's Green is Jess than 100 yards from the development.

1. There are extensive views across the whole of the development site from Yarne from the ground floor, from first floor and from the

1. The development property will commence immediately beside Yame with a path/roadway within metres of the

No attempt has been made to separate the development from the heritage asset.

1. No attempt has been made to form a realistic view of effect of the development on the setting of Yarne and its

Architects drawings are included in the application showing the line of sight between various heritage assets and the proposed building in the development:

No line of site drawings are included in respect of Yarne. This is extraordinary given that Yarne is the heritage asset closest to the development and has the longest boundary with the development. It an1ounts to deliberate adverse selection of the facts in a blatant attempt to misrepresent the effect of the development on Yarnc.

3.3 Views from Yarne onto and across the Application Site

The views to and from Yarne are described in s 11 of the Environment Statement Vol 1. While it is claimed in para 11.3.216 that 'hedgerows ...screen ground floor views' the reality is that 240 yards of housing on the development site will front the western and northern boundaries of Yarne. It is further stated that 'Upper storey views are directed along the southern boundary of the site with some additional filtering by boundary trees.' That is misleading.

A defining characteristic of the house is its position in open countryside near the top of a long incline with panoramic views to the west.

The contour map from the planning application confirms that Yarne stands at the highest point of the Application Site. The only higher ground nearby is at the top of Hatchford Hill about 400m to the east.
In para 1.4.63 it is stated, 'Views towards the Application site are restricted to upper storeys'. [That is a blatant falsehood.] Construction impacts will be notable from Neighbourhood 2 increasing in significance to major/moderate as Neighbourhood 4 is completed adjacent to the properties boundaries. Once completed, the impact will reduce slightly due to the reduction in movement and construction activities within the view, however the outlook will change considerable from an open, albeit degraded, landscape to close distance urban frontage.'

The statement in 11.4.65 concerning the views from Ratchford Cottage and Forge Cottage are also false. These cottages stand near the crest of Hatchford Hill. They therefore enjoy panoramic views over the Application Site to and beyond Woking and all a long the North Downs.

The application alleges that the runway 'degrades' the view from Yarne. The statement is manifestly false. It is impossible by definition for something which has zero height to 'degrade' a view. Something of no height cannot obstruct any line of sight. The claim is just another of the many false and misleadi ng claims made by the developer. The runway is not visi ble from Yarne except from the most northerly part of the garden and it makes no impact there because it has no height. It is also alleged that the navigation beacon 'degrades' the view. This is an absurd statement. It applies completely asymmetrical tests to the factors which run against the development and those that run for it. The beacon is a structure which is not much more than one storey high. It is built as a steel frame and it is possible to see through the framework. Yet this tiny structure 'degrades' the landscape view whereas the highest density development in the borough enhances the environment! Perfectionism is req ui red for Yarne to be worth y of protection and any standard can be appli ed in order to justify development. The consultant to my knowledge has never looked at the view from Yarne - at least not from within the property with the owner's permission. The statement that the view is degraded by the runway impugns the professionalism and integrity of the consultancy which made it. You could say with as much justice that Sophia Loren's face was degraded by her lips because they are imperfectly large.

The development immediately beside Yarne will start some 10m or so from the boundary and will be up to three storeys high. The houses will therefore be visible from every part of the property, from within the ground floor, from the first floor and from every part of the garden. Taller five storey buildings will be situated further from the boundary. A townscape will be substituted for a landscape. This will destroy the setting of the Parish of Ockham and its heritage assets including this fifteenth century farmhouse.

3.4 Inter visibility

The houses along the southern side of the Application Site are all situated along a spring line. All these houses sourced water from their own wells and it is believed they were not connected to the water mains by the East Surrey Water Company until after 1900.

Yarne, Little Upton, Old Farm and Bridge End Fann all enjoy indivisibility. There is also indivisibility of Yarne with the dwellings at the top of Ratchford Hill (Forge and Hatchford Cottages, inter alia). The reciprocal views would be permanently destroyed by the new town.

- Connected, living landscape

The open countryside forms a connected landscape between the SPA to the north and the land to the south. Deer, other mammals, birds and insects continuously travel between the SPA and woodlands to the south (Tanner's Copse and the woods at Effingham and Beckham down to the North Downs). The introduction of an alien 'urban feature' will cut off the ancient conduits used by these insects and fauna. It will destroy the habitats which support many endangered bird species, especially the ground nesting Skylarks. The building of an urban settlement along the crest of the sandstone ridge will cut off the SPA from the land to the south causing permanent and irreparable harm to the ecological setting of the parish. It is ridic ulous to suggest that a few bird boxes on a housing estate will satisfactorily compensate for a lost landscape.

3.5 Relationship of Ockham with Ockham Common
Ockham and its common form an integrated historical and ecological whole. The interaction of human beings, animals and geology have created the rare lowland heath on Ockham Common, which Surrey Wildlife Trust describes as 'rarer than rainforest'.

The many miles of interconnecting local footpaths testify to the connectedness of the settlements of Ockham with their Common.

The creation of a new urban settlement, described as 'garden city' in style, is harmful to the fragile local ecology and to the local rural economy which depends on horse riding, arable farming, and pheasant shooting.

The application alleges that the agriculural land on the Application Site is poor grade 4 land or non-agricultural land. During the Summer of 2014 the agricultural Land Agent for the land (Knight Frank Rural Consultancy in Hungerford) advertised the land as Grade 3 land i.e. as good agricultural land.

3.7 Closure of Ockham Lane

The application proposes to close Ockham Lane and Plough Lane and to make Old Lane and Guileshi ll Lane one way.

Closing Ockham Lane, a public right of way for hundreds of years, will cut Martyr's Green, May's Green and Hatchford End off from the rest of Ockham.

The proposal made in the application that Ockham Lane should become a pedestrian route from the new town to the Black Swan public house will adversely affect the setting of Yame, Oakmead and Red and White Rose Cottages which can be expected to suffer from increases in littering and antisocial behavior.

Conclusions

The developer has fundamentally misrepresented the heritage of Ockham, its ecology and economy.

It is stated for example, that the land 'contains the largest previously developed site within the GB part of the Metropolitan Green Belt'. The previously developed element of the land is a fraction of the whole. It is a misrepresentation to propose that all the surrounding farmland is part of the previously developed element.

It is stated 'The land is subject to recommended release from the Green Belt as part of the emerging Guildford Borough Local Plan'. That is clearly false. The draft local plan makes no such recommendation, nor does any of the evidence base.

It is stated 'the principle of a new settlement at Wisley attracts local policy support. The site has been identified as a new settlement and hence removed from the Green Belt within the emerging GBLP, as justified by the Borough Council 's evidence base.' The land has NOT been removed from the Green Belt. Nor does inclusion in the draft local plan without any proper evaluation or sequential testing amount to 'local policy support'. It amounts to a procedural irregularity which calls in question whether a proper professional and arm 's length relationship exists between Guildford Borough Council and the developer.

It is stated: 'The housing situation in Guildford Borough ...points to a critical situation which requires redress via the most suitable, available and sustainable sites.' The statement is one of opinion and not fact. The Objectively Assessed Housing Need has not been publicly scrutinised. So far as local housing need is concerned, the Royal Horticultural Society at Wisley owns some seventy properties -almost all of the village. Of these some fifty houses stand empty. That suggests that there is no shortage of houses in this ward. While there is a shortage of social housing that is a direct result of council policy. It has not built any council houses for twenty years. The average number of persons per house in the borough stands at approximately 2.4. That does not indicate a 'critical' situation. If the situation were truly critical then the average per house would be significantly higher.

The proposal does great violence to the heritage of Ockham and its heritage assets and to the local ecology of Ockham Common. The site is completely inappropriate for a 'new urban feature'. City and urban features are wholly out of place in this geographically constrained and ecologically threatened corner of Surrey.
While the proposal pays lip service to the requirements of planning regulations it does not seek to understand Ockham or its historical context. Rather than consider the parish as an integrated geographic, economic, ecological and legal whole it prefers to focus on the 30 or so hectares of disused runway to the neglect of all other elements.

Rather than acknowledge the consequential harm caused by the proposal, the application seeks merely to deny the existence of harm and/or its extent by claiming falsely that the development site is discrete and disconnected from the rest of the parish. Since the premises of connectedness and harm are denied the proposal contains no meaningful mitigation measures. Indeed since the proposal is so fundamentally incompatible with the parish and its surroundings there are no possible mitigations. This is all the more the case because the core thesis supporting the proposal is that it is 'sustainable'. The logic supporting this hypothesis is that the project is sufficiently large to be able to stand alone and that as a result of its size it will attract sufficient facilities to make it sustainable. This logic flies in the face of the fact that there are no existing facilities at site which justify its selection as a suitable site for development. In short the logic is self serving, intellectually dishonest, and completely at variance with the facts.

The reality is that an outsized development of some 2,100 dwellings is being shoe horned into a site scarcely bigger than half a square kilometre or roughly 700m x 700m. This development is described as the third largest concentration of housing in the borough behind only Guildford Town itself and Ash and Tongham. Whereas Guildford Town and Ash and Tongham have extensive facilities and are not immediately affected by Special Protection Areas, Ockham has no facilities and its ecology is already threatened.

The harm caused to Ockham is substantial, adverse and permanent. The so-called mitigation measures are an undersized sticking plaster which do not begin to cover the gaping wound which this development would leave. If allowed the development will devastate the parish of Ockham and its surrounding villages.

The proposed new town is many orders of magnitude greater in its impact on the Green Belt that the existing 'development' (the disused runway). It is therefore incomprehensible why the planning application should have proceeded this far.

The map below demonstrates that the Application Site is slap bang in the middle of the Green belt separating Woking, Byfleet, Cobham, Effingham, the Horsleys, Ripley and Send. Development of this site is a dagger pointed at the heart of the Green Belt. If the applicant succeeds the future of the Green Belt in this area will be fatally jeopardised.

Regulatory Capture, lack of transparency and disclosure

There is no evidence that any 'sequential tests' were carried out to try to identify the most suitable sites for new towns in the borough. This creates the suspicion that the inclusion of the site in the local plan was highly improper and the result of the 'regulatory capture' of the local authority by the developer. Inclusion within the draft local plan should not pre-determine the outcome of the planning argument.

There is also a risk that the planning department has a grave conflict of interest insofar as it has provided very extensive (and undisclosed) pre application advice to the developer on how to present its application. The public has no assurance that GBC has implemented proper 'Chinese walls' between those officials advising the developer and those officials responsible for preparing the local plan.

This may be still another example of the confusion between GBC's role as planning regulator and its role as adviser to the applicant. The public has reason to believe that the regulator has been captured by the applicant. Application 15/P/00012 was held open for a year to enable the applicant to amend it.

It is of particular and grave concern that this site remains in the local plan despite Application 15/P/00012 being unanimously refused by the planning committee of GBC.
This was no doubt the purpose of the previous application was to build an in-vessel composting facility. That facility was granted permission on the basis that the Surrey Waste Plan constituted a 'very special circumstance'. Despite the purported 'specialness' of the circumstance the applicant has not lifted a finger to build the facility in the subsequent years. And in Application 15/P/00012 it says that the waste plant is no longer required by the Waste Plan. So the circumstances are now considered by the applicant itself to be no longer special. This reveals the cynicism of the applicant which is prepared to make any claim, regardless of whether it intends to act on it and regard less of the long term plausibility or real ity of the claims made in order to achieve permission. The public was duped by the waste plant application. Part of the Green Belt was intended to be permanently sacrificed in the interests of a proposal for a waste plant. But the viability of the waste plant has not endured beyond six or so years. The Inspector was clearly taken in. The waste plant proposal was so much 'vapour ware'. And the applicant suffers no sanction for making misleading claims. It is ridiculous to claim that the site has 'permissioned' access when the permission was granted for a very different development and developer states in 15/P/00012 that it is seeking to revoke the very same permission: 'the applicant proposes to commit to not deliver the extant consent for a Waste Facility'.

Indefensible Green Belt boundary

The NPPF states that the Green Belt should be permanent. Para 83 states:

"Local planning authorities with Green Belts in the ir 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."

The new local plan seeks to establish the garden of Yarne as the Green Belt boundary. It is an arbitrary line marked by a hedge. It is not defensible. A road or a railway line would be defensible. But an organic feature marking the edge of a garden hardly qualifies as a 'defensible' boundary. It is an example of the inconsistent and arbitrary manner in which GBC applies the planning rules. There is one interpretation for residents and another entirely for developers that propose to build whole new towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- 4.JPG (104 KB)
- 5.JPG (95 KB)
- 11.JPG (55 KB)
- 10.JPG (38 KB)
- 2.JPG (96 KB)
- 14.JPG (75 KB)
- 8.JPG (35 KB)
- 19.JPG (99 KB)
- 17.JPG (79 KB)
- 1.JPG (98 KB)
- 3.JPG (68 KB)
- 13.JPG (68 KB)
- 7.JPG (42 KB)
- 9.JPG (30 KB)
- 15.JPG (79 KB)
Objection to the removal of Three Farms Meadow in Ockham from the Metropolitan Green Belt

Objection to the systematic promotion of this site for development by the owners and Guildford Borough Council on the basis of false information

Policy A35 proposes Land at the former Wisley airfield in Ockham as a Strategic Development Site for a new town. The town is to comprise some 2,000 houses and would be the third biggest settlement in the borough.

In order to develop this site the owner has persuaded Guildford Borough Council (GBC) to propose the removal of the land from the Green Belt. It has pursued this policy of courting GBC since 2007 when the current owner purchased the site for some £23m.

**History of the site**

The site has been farmed for many centuries by tenants of the Ockham Park Estate- which was originally owned by the King family. During WW2 the site was acquired by HM Government for ‘war time purposes’ on the understanding that it would be returned to its former agricultural use after the war. During the war in 1943 a grass airstrip was created on the land which was used to fly out aeroplanes being built by Vickers in its factories at Brooklands. Agriculture continued around the grass airstrip during the war. After the war Vickers continued to build aeroplanes at Brooklands and requested an extension of the lease. Aeroplanes propelled by jet engines caused the grass runway to catch fire and so in about 1952 a concrete runway was put down. Vickers was subsequently subsumed within what is now BAe and all flying ceased in 1972. In 1980 the government sold the land back to the inheritor of the Ockham Park Estate for its agricultural land value (some £300,000). Permission to re-use the aircraft hangars for intensive farming purposes was refused. Later an application to create a private airport was the subject of a long public enquiry[2] and was also refused. GBC and SCC both opposed all applications to develop the land. All the buildings were removed prior to the sale back to the pre-war owner. The whole site is within the Metropolitan Green Belt. The original lessees whose leases were annulled during the war never recovered the land which they had formerly leased.

**Current ownership**

In 2007 a Jersey company called Wharf Land Investments Ltd purchased the land from Legal and General. The land parcel comprised some 114.7ha. Of that area some 63ha is good quality agricultural land – of which some 45.4ha is ‘Best and Most Versatile’ land. Some 24.6ha is non agricultural land – comprising scrub, woodland and grass. Some 27.1ha comprises the concrete runway and former hangar area. Of the 27.1ha of concrete some 17ha has been set aside for the Surrey Waste Plan. Therefore only 10ha of the concrete area within the site can be considered to be ‘brownfield’ or
previously developed. 10ha out of 114.7ha constitutes less than 10% of the total area. Moreover of that 10ha a significant proportion stands within 400m of the Special Protection Area for endangered species at Ockham and Wisley Commons and therefore may not be used for new residential housing.

The new owners were well aware of the land’s Green Belt and agricultural land designations when they purchased. An Agricultural Land Classification was carried out in August 1979 and is filed at Natural England. It shows all the agricultural land as Grade 3a and 3b. A more recent classification filed with planning application 15/P/00012 provides more detail and shows a proportion of the land as Grade 2.

Once it acquired the land Wharf Land, owned by Douglas Maggs and David Mellor (the former Conservative Cabinet Minister), set about achieving a change of use of the land. It applied for planning permission to build a waste composting facility, which was granted on appeal in 2010 subject to a list of 23 conditions which included limiting the maximum tonnage of waste per annum, the number of lorry movements and the hours of use. This development was never actioned by Wharf Land but was not allowed to lapse after some soil was imported to the site in the week before expiry of the permission.

Wharf Land was sued in Jersey[3] by one of its investors for making ten payments amounting to some £1.5 million to persons unknown without providing any details. The largest payment exceeded £1 million and was paid to a Gibraltar company called Shoehorn Ltd. Disclosure of the parties to whom the payments were made were never disclosed after shareholders voted to approve the transactions. Whether any of these payments were ultimately received as inducements for working towards a change of use of the land is not known.

In 2013 Wharf Land was sued in the High Court[4] in England by a Russian investor called Lisitsin. The court awarded Lisitsin some £1.4 million in damages and the judge said the defendants were ‘knowingly complicit in fraudulent misrepresentation’.

Before the trial had concluded Douglas Maggs put Wharf Land into administration. Its assets were acquired by a new Caymans company called Wisley Property Investments Ltd, (WPIL) the current owners. The ownership of WPIL is not disclosed but is thought to include Lisitsin and RAB Capital Special Situations Fund, a hedge fund. GBC has refused to exercise its right to enquire into the ownership. WPIL is represented in England by Mr Michael Murray, a Conservative Councillor at the Vale of White Horse in Oxfordshire, where he is responsible for their local plan.

WPIL has put in a number of planning applications. Two planning applications sought permission to use the land to make films. One was withdrawn by the applicant after very considerable public protest. The second was refused, appealed and refused again on appeal. The latest application, in December 2014 was for a new town of 2,100 houses. The application was held open for an entire year while further information was collected and finally submitted in December, 2015. The application was finally heard by the planning committee in March, 2015 and unanimously rejected.

Factual misrepresentations by the applicant

WPIL has consistently repeated a number of gross factual inaccuracies regarding this site. It has claimed that the site is poor quality agricultural land. Application 15/P/00012 states that the agricultural land is Grade 4, whereas it is in fact all Grade 3 and above. The application states that the site has ‘permissioned access to the A3’. At best that is misleading and at worst it is a deliberate lie. The site has no access to the A3 for a new town of 2,100 houses. Such permission as it has for a waste processing facility is hedged by 23 conditions which limit hours of access and numbers of lorries per day. The applicant has claimed that the site has good connections to railways, whereas it is about as far from railways as it is possible to get in this part of Surrey. The claim that it is possible to cycle to Effingham Junction station in six minutes is demonstrably false. These and other bogus claims are made in planning application 15/P/00012 despite the application containing a statement as to the truth and accuracy of its details.

Role of GBC

It may be expected that an applicant might promote its site with ‘no holds barred’ because of the very substantial development profits at stake – possibly in the region of £500 million. As the local planning authority performing a quasi judicial role it might be expected, however, that GBC would have taken a more fastidious approach to the facts.

However, GBC has been far from impartial. Mr Murray participated in public roadshows to promote the draft Guildford Local Plan. GBC included this site in both the Issues and Options Paper and in the draft Local Plan – led my the former
Lead Member for Planning, Ms Monika Juneja who was subsequently convicted of forgery and fraud in relation to her professional qualifications. WPIL paid GBC for pre-application advice. Minutes of meetings with WPIL’s adviser, Savills, to the extent that they have been disclosed, reveal that GBC advised WPIL to conduct public meetings in Guildford rather than in Ockham to minimize dissent. GBC has taken no apparent steps to correct the blatant falsehoods contained in 15/P/00012. There is evidence which suggests that GBC has sought to predetermine the outcome of any enquiry into whether the site could be developed by advising the applicant on the timing of its application and by including it in the draft local plan as a site for removal from the Green Belt without showing any exceptional circumstances justifying its removal. The applicant in 15/P/00012 cites the inclusion of the site in the draft local plan as itself being an exceptional circumstance. It would appear the GBC also believed that the mere inclusion of the site in the local plan was a sufficient exceptional circumstance.

Advertising campaign

Subsequent to the refusal of 15/P/00012 WPIL has run an advertising campaign in the local press in particular in the Surrey Advertiser. It has also run trailers in local cinemas (eg The Ambassador Cinema in Woking) promoting development the site for a new town. The same false and misleading information which WPIL used in planning application 15/P/0012 and on its website is repeated. The advertising campaign is intended to sway public opinion and presumably to influence borough councillors and the planning committee which may in the future be required to adjudicate another planning application.

Complaint

The factual basis on which this site has been promoted for inclusion in the local plan as set out by the applicant in its promotional material and its website is materially false in a number of very important respects. GBC has done nothing to insist that these errors of fact are corrected. Its impartiality as a planning authority is in doubt. I attach my recent complaint to the Advertising Standards Authority about the advertisements appearing in the Surrey Advertiser (attached). I am concerned that GBC has been swayed by a number of these false claims. In particular it has gone from a longstanding position that the site was not suitable for development to seeking to assist the developer have the site removed from the Green Belt. My complaint to the ASA would not have been necessary if GBC had upheld the standards of probity in planning applications and planning matters generally that the public has a right to expect.

[1] See Attached History of former Wisley Airfield

Enclosures:

- Double full page spread advert in Surrey Advertiser, 13 May, 2016
- Letter to the ASA dated 16 May, 2016
- History of Wisley airfield
- Press cuttings from Surrey Advertiser in 1980
- Jersey Law Report
- Press release by Wallace LLP

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Objection to the systematic promotion of this site for development by the owners and Guildford Borough Council on the basis of false information.

Policy A35 proposes Land at the former Wisley airfield in Ockham as a Strategic Development Site for a new town. The town is to comprise some 2,000 houses and would be the third biggest settlement in the borough.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
10. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

11. Opportunity (3) should be common to all sites and is not unique to this site

12. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm, negatively impacting the setting of this building.

13. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

14. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

15. I object to the removal of additional 3.1 ha from the green belt without any justification

16. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

17. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

18. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

19. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees. It is outrageous that local public opinion is being ignored in this way.

20. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

21. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

22. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

23. I object to the extension of the plan period by 1 year as it has not been identified as a major change

24. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

25. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

26. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

27. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

28. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

29. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

30. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

31. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

32. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

33. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. All in all I object to this development as I believe that there is is no justification for a development of this size in the Green Belt. There are no exceptional circumstances which justify the development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the new draft local plan inclusion of the Wisley Airfield development:

- The proposed scale of the site is out of all proportion to the surrounding area. It will in effect create a new town that will dwarf the existing village of Ripley.
- The impact on local roads of the additional traffic will be significant and negative in terms of congestion and pollution; the existing road network will not be able to cope. The impact on public transport will also be significant; the carpark at Effingham Junction is already full and will not be able to absorb the inevitable increase in demand.
- Residents of this new town will be situated adjacent to the A3 which means placing schools and houses in an area that will inevitably have poor air quality.
- This is clearly an attempt by GBC to meet a significant proportion of their designated building target in a single hit rather than organically place houses in a more sensitive manner.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The removal of the Former Wisley Airfield from the Green Belt which will result in an urban corridor stretching from London to Guildford.

Finally, I object in the strongest possible terms to the continued inclusion of the Former Wisley Airfield now known as Three Farm Meadows where the planning application has already been unanimously rejected by GBC’s Planning Committee. Many authoritative sources across the UK have indicated concern to such a development on this site (eg Highways England, Thames Water, NATS and the Environment Agency).

I trust that these objections will be fully considered and that the Former Wisley Airfield now known as Three Farms Meadows Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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- This is clearly an attempt by GBC to meet a significant proportion of their designated building target in a single hit rather than organically place houses in a more sensitive manner.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Development should be centred on brown field and urban areas. Brown field in this context does not mean Three Farms Meadows – I also object to the proposal to include this in the local plan. There is a massive amount of opposition to this for good reason – again lack of infrastructure as above, density, wildlife and above all the principle of building over farm land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4489</th>
<th>Respondent: 8774369 / Gary Cooper</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I support the development of Wisley Airfield</td>
<td>There is no doubt we have to provide some new homes and they have to go somewhere. Wisley airfield is in my view suitable, but only if the site is provided with direct access to junction 10 of the M25</td>
<td></td>
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<tr>
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<tr>
<th>Comment ID: PSLPS16/467</th>
<th>Respondent: 8774593 / Rod &amp; Jan Gerrard</th>
<th>Agent:</th>
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<tbody>
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</tr>
<tr>
<td>Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings</td>
<td>I strongly object to the draft Local Plan for the following key reasons:</td>
<td></td>
</tr>
<tr>
<td>1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
<td></td>
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<tr>
<td>2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.</td>
<td></td>
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</tr>
<tr>
<td>3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them). The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield, now known as Three Farms Meadows – Allocation A35 – for the phased development of a new settlement of up to 2100 dwellings.

My objections to the draft Local Plan read as follows:-

The proposal that over 70% of new housing be built within the Green Belt rather than utilising brownfield land in urban areas needing regeneration.

The removal of the Former Wisley Airfield from the Green Belt which will result in an urban corridor stretching from London to Guildford.

The proposed number of 693 houses per year which is far too high and double the figure used in previous plans.

The threat that the Local Plan poses to my village of Ockham and the subsequent detrimental impact on its property.

The horrific impact such development would have on transport bearing in mind the narrow unlit lanes which are dangerous enough already. This would increase the volume of car traffic to an estimated 4000 additional cars plus wider vehicles like buses resulting in congestion both in the villages and the A3 and M25. There are no cycling paths and few pavements which would further compromise the safety of cyclists and pedestrians.

There is a lack of public transport and Horsley and Effingham stations are full to capacity already as are the station carparks.

To develop this site would involve a massive infrastructure project.

The current owners have zero intention of developing the site and are telling their investors they will immediately sell the property for a substantial profit once the have planning permission. As a consequence we would then have to go through the whole process with the new owners.

The property is registered in the Cayman Islands for secrecy and tax reasons this does not deter our representatives GBC.

There is insufficient consideration given to the environmental and ecological value of the site.

Air pollution in many parts of the borough is in excess of EU permitted levels, especially at the M25/A3 junction.

Finally, I object in the strongest possible terms to the continued inclusion of the Former Wisley Airfield now known as Three Farm Meadows where the planning application has already been unanimously rejected by GBC’s Planning Committee. Many authoritative sources across the UK have indicated concern to such a development on this site (eg Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield now known as Three Farms Meadows Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I attended the meeting on 8th April regarding The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Ref: 15/P/00012) and this was unanimously rejected by GBC following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

(a) was an inappropriate development within the Green Belt;

(b) would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;

(c) failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;

(d) failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;

(e) was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.

(f) would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;

(g) failed to deliver the required transport sustainability measures;

(h) failed to secure an appropriate provision of affordable housing;

(i) was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;

(j) would result in loss of the safeguarded waste site;

(k) presented a dense and urban form of development owing to its quantum and scale;

(l) had an adverse impact on the setting and significance of a designated heritage asset;

(m) had an unacceptable air quality impact;

(n) impacted on education infrastructure;

(o) impacted on policing infrastructure;

(p) impacted on health infrastructure;

So I was completely baffled when we went to the next meeting at the GBC Millmead, on 24th May, to be told that they were going to go ahead with the plan anyway!! So why are we continually writing our objections when they are completely ignored?

Anyway, I object very strongly to the submission of the local plan, specifically for The Three Farm Meadows (the former Wisley Airfield). I could rewrite my objections from all my previous emails/letters, but I cannot see that they will make a difference!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPS16/357</th>
<th>Respondent: 8790529 / Nigel Carter</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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1. The proposed plan also includes for the development of Wisley airfield. This would have serious adverse effects on the surrounding villages;
   - The additional 5,000 residents is the equivalent of doubling the population of East and West Horsley combined
   - The proposed housing density is completely out of keeping with the surrounding rural area – five storey buildings are not appropriate in a rural environment
   - The resulting impact on light pollution, traffic and infrastructure has been gravely underestimated and proposed mitigation measures are totally inadequate
   - The cumulative impact of development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge has not been taken into account
   - The air quality surrounding the site gives grave cause for concern as levels of NO2 already exceed the EU limit
   - There is insufficient information on the impact on the water table and flooding in the area – the whole of the surrounding area is prone to flooding, and the impact of the River Mole is considerable.
   - Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham, Ripley, Downside and further afield.
   - The development will impact the listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm
   - The closure of a number of local roads coupled with a massive increase in traffic will impact a large number of road users from Cranleigh to Cobham and everywhere in between.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. The proposed development of the old Wisley airfield will also generate a considerable knock on effect on Horsley infrastructure – particularly roads, railway station, shops, medical facilities, schools etc. – this has not been properly considered either.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7986</th>
<th>Respondent: 8791265 / Rachel McKnight</th>
<th>Agent:</th>
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<td>Development of over 2000 houses (former Wisley Airfield), would have a huge and detrimental impact on the Horsleys, The mixed development, including retail, commercial and traveller development, would have a huge impact on the character and infrastructure of the Horsleys. They would inevitably get sucked into a kind of urbanization by the back door.</td>
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<td>I also object to the proposal for approximately 2000 houses plus sheltered/care homes, Gypsy/Traveller pitches, employment/retail spaces and two schools on the former Wisley Airfield and fields, which is at odds with the revised policy 1D3. It is impossible to offer a sustainable transport policy for a site which is located in the middle of nowhere with no amenities, narrow country roads and no public transport facilities.</td>
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| Comment ID: PSLPS16/103 | Respondent: 8792193 / Brian Wolfe | Agent: |
5.5.POLICY A35: Land at former Wisley Airfield

5.5.1. Proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

5.5.2. I have major concerns about this proposed development and have objected against both recent planning applications. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability. It will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will create a devastating impact on traffic on both LRN & SRN in the area and irreversible destruction to the character of one of the most picturesque and historic areas of the country. Development at the proposed density and building mass that will create an urban enclave in the countryside visible from mile. Yet for those who have to live there no private open space, gardens or allotments miles from any social entertainment, miles from any employment. Everybody jumping into car to overcome the isolation how does that fit with the NPPF. There is no evidence that travel mode changes will prevent that happening.

5.5.3. I would like to record my objection to the inclusion of Wisley site within the local plan as a potential housing site the planning application 15/P/00012 | AMENDED DESCRIPTION: was rightly turned down because it was in the green belt and that the developer had failed to satisfy the HE and Surrey County Councils over this development likely impact on the road network. Nothing in the Local Plan has changed that position.

5.5.4. A Local Authority cannot rely on future investment commitment by third parties to deliver the infrastructure requirements that are required to support their Plan. Without that certainty A Local Authority under the latest updates in the Housing and Planning Bill could leave themselves with an obligation to provide the required infrastructure simply because the site was included in the local plan with presumed approval. This was previously the case when planning permission was granted a developer could for example requisition a sewer and a Water Authority was obliged to provide said sewer at their cost.

5.5.5. The same could apply where a site if included in a LP (with its presumed approved status) the LA would need to have the supporting infrastructure either in place or fully designed and costed proposals in place to support any development. Clearly this is not the case with GBC local Plan there is no proof, evidence that for example the transport infrastructure proposed will let alone work, can be delivered, or have been fully costed. In the plan are costing for some projects range from £100m to £250m hardly a well thought out budget planning advanced for a programme of work. 58 Projects out with only 4 committed!! How can a local plan go forward with so much uncertainty? Developments, more importantly people will be dependent on all packages being delivered. It like saying to somebody, you have the car now but the wheels will come next year. You acknowledge what underinvestment in infrastructure has done in the past. You plan will provide the same result as in the past, caused by the very same reasons, pushing forward with growth and homes without the infrastructure being there to support it. Get the infrastructure in place first the rest will follow the funding can still be obtained from the developers at least by that time you will know the full cost.

5.5.6. The comments made by Natural England and there apparent approval of Air Quality issues on this site are being legally challenged.

5.5.7. The proposed one way restriction on Old Lane south of the A3 as proposed in the TA from the developer and seemingly repeated in the local plan evidence base is apparently acceptable to the Highways Agency. This restriction will however not occur adjacent to the A3 but some distance from the slip road. The impact of this closure to southbound traffic will impact on minor roads in the area not controlled by HE but by SCC and no closure notice is approved nor have SCC approved such a restriction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

In regards to the draft Local Plan and for the following key reasons:

1) I object to the use of Green Belt land for development. Green Belt areas should not be reduced by development for any reasons as once taken, they are gone forever and this allows a dangerous precedent that will proceed to render the principle and overarching natural, cultural, health, tourist and environmental benefits that it currently provides. Housing ‘need’ in a Borough must not be seen as a justification for ‘exceptional circumstances.’ Green Belt is critical to the region as a whole and needs to remain intact.

2) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There are ample infill sites within cities, towns and villages including a rich resource of brownfield land in the urban areas, which needs to be regenerated, without the need to encroach into protected Green Belt land.

3) I object to the proposed removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt and for consideration for its development. The site serves a vital role in protecting against urban sprawl from London. Development on the site will help develop an urban corridor stretching from London to Guildford. Under the NPPF, no ‘exceptional circumstances’ have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

5) I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). I see the inclusion of FWA/TFM as pure political development providing a massive amount of a wayward and misleading housing target.

6) 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.

7) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. Severe negative impact on rural life and character, forever changing the makeup of the area to that of a suburb.
   b. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   c. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   d. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   e. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   f. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the...
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8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

9) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

10) 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.

11) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I did not work hard and chose carefully to take residency in this unique, beautiful, special area to have it ruined by a Plan, which is clearly being promoted by development minded politicians and investors. Please redraft the Plan to spend my hard-earned taxes on developing housing on appropriate sites within cities and towns with existing infrastructure and the appropriate urban character and not by the misleading, convenient rationalisation of handing our irreplaceable countryside and cherished Green Belt to irresponsible developers who have no invested interest whatsoever in this region or its intrinsic value, which we must maintain at all costs for generations to come.

Once precedent would be set to take Green Belt, it would not cease until Green Belt itself is gone. This cannot happen. I trust that these objections will be fully considered, the Plan altered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
large site to be proposed on an effectively anonymous basis is a sad testimony to English planning law. Accordingly, I OBJECT to this policy.

I strongly encourage GBC to withdraw its draft Local Plan in the light of the Brexit vote and re-cast a substantially less ambitious plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1690  **Respondent:** 8795553 / Robert Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy A35 Land at former Wisley airfield**

There are some minor changes proposed in the revised draft Local Plan to Site Policy A35, land at the former Wisley airfield. However, these changes do not address the many fundamental weaknesses of this proposed site for development, including its very poor sustainability, its total lack of transport sustainability, its destructive impact on local wildlife and ecology, the illegal air quality, the major destruction of the Green Belt at a critical location outside the M25 circle, the severe harm caused to local traffic and traffic on the A3, and the major impact on already over-stretched social infrastructure in the locality.

The proposed urban-style high-density development would be inserted in the midst of five rural villages and be totally incongruous to the character of this historic rural area, which would suffer irreparable harm.

In the revised draft 2017 Local Plan GBC a number of sites which removed which had been in the 2016 plan. As such I seriously question the site selection criteria which has been employed by GBC and that results in a number of major sites being removed whilst a site such as Wisley remains - a site with such poor site sustainability and many other major deficiencies.

For the reasons above therefore: **I OBJECT TO SITE POLICY A35, LAND AT FORMER WISLEY AIRFIELD**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/676  **Respondent:** 8795649 / G Pask  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/680  Respondent: 8795649 / G Pask  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 4th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farm Meadows), Allocation A35, is immediately removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3898  Respondent: 8795649 / G Pask  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the Continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft local Plan for the following key reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the GreenBelt. There is ample brownfield land in the urban area as which needs to be regenerated, without the need to encroach on protected GreenBelt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at theM25/A3junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously-air pollution in many parts of the borough, and particularly at theM25/A3 junction, is in excess of EU- permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and their reversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows)-where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration and various extensions and amendments), Wisley Property Investments Ltd's(WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1687  
Respondent: 8796129 / D M McFarlane  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the removal of the Airfield from the Green Belt, in order to build 2000+ dwellings there. I consider that available urban brown field land should be used.

I wish to object because:

1. The local roads near Ockham are too narrow to take increased traffic.
   1. The A3 and M25 are inadequate for more heavy
   2. Local facilities - schools, doctors,shops, - would be seriously Cobham already has daily parking problems and there is at present no site for a secondary school in Cobham.
   3. Air pollution near Wisley RHS gardens would be further

I hope the planning department is able to find a more acceptable solution to the need for housing 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: pslp172/2212  
Respondent: 8796321 / Nick Etches  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/727  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 the Wisley site. Why is this still in the local plan, it has already been rejected by GBC as unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2786  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to register my continued objection to the inclusion of Policy A35, Three Farm Meadows in the Draft Local Plan for many reasons.

1. I object to the change of boundaries which are identified incorrectly on the plan.
2. I strongly object to the removal of an additional 3.1 ha from the green belt – this is completely lacking in justification.
3. I object to the council not listening to previous representations and wasting tax payers time and money.
4. I object to the disregard of of the constraints of designated green belt land, infrastructure, air quality etc.
5. I object on the grounds that this site is the furthest from railway stations than any other possible site identified.
6. I object in relation to traffic associated with the RHS site opposite – the increases in traffic associated with this tourist attraction have not been taken into consideration.
7. There is a lack of employment on site – so most residents will travel to work. This will mean an increase in traffic – people will not regularly walk/cycle.
8. Local roads are at capacity and there are regular hold ups already.
9. I object to the lack of consideration regarding the damage caused by high pollution levels and nitrogen deposition.
10. I object to the lack of explanation regarding the change in the original time frame for the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY A35, land at former Wisley Airfield, Ockham

This proposed development of over 2000 homes will have major adverse consequences on the local infrastructure, in particular:

- High volumes of traffic on local narrow lanes in all surrounding villages.
- Unmanageable traffic flows onto an already busy A3 and Junction 10 of the M25.
- Additional traffic forced through Ripley and Cobham as a result of proposed road closures and junction changes. Particularly in the rush hour and school arrival and departure times these two towns are virtually impassable.

In addition

- As a result of the A3 and M25 junctions, levels of Nitrous Oxide around this area are already high and will be added to by the approximately 4000 additional vehicles from the site. This will be dangerous for new residents.
- The site is important for wildlife, being a Site of Special Scientific Importance. This was set up to provide protection for rare and threatened birdlife in certain lowland heath locations.
- There is currently no infrastructure at all on this site, meaning that all water, gas, electricity and telephone will need to be installed.

For the above reasons I OBJECT to the above-named Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
there is no infrastructure on the Wisley Airfield site so all of this would need to be put in place to support such a large number of new houses.

- the already congested junction of the A3/M25 would not be able to cope with a vast increase in the number of cars such a development would generate.
- the increase of extra traffic would have an adverse affect on the air quality in the area surrounding the site which would be detrimental both to people and the countryside.
- the local roads in the surrounding area are already congested and are not suitable to cope with the huge number of extra cars generated by a proposed development of 2000+ new houses.
- the schools in the surrounding area are already over subscribed and therefore cannot support an increase in pupil numbers from the proposed development at Wisley Airfield.
- the Medical Centre in East Horsley is operating to capacity and making an appointment is already difficult but this would become even more frustrating if numbers at the surgery increased.
- the shopping centre in East Horsley thrives and very often it's difficult to park so this would be increasingly difficult with the extra cars using the shopping centre.
- the number of people commuting to London or Guildford would increase and the station car park has insufficient capacity for many more cars.

For these reasons I OBJECT strongly to Policy A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am writing to object to the latest Local Plan. The reasons for this are as follows:

1) I strongly object to the local area being taken out of the Greenbelt and the turning of our villages into an A3 urbanised corridor. The greenbelt should be protected at all costs. It is an easy option to give over hundreds of acres for building before exploring other avenues. Three Farm Meadows is in all but name, not a brownfield site, it should be designated greenbelt as it has been part of our rural environment for years. It is totally inappropriate to build over this land which has become a natural habitat of so much flora and fauna. Our villages wish to remain villages. Our children need green space to grow and flourish. It would be tantamount to an act of vandalism to carve through our beautiful countryside for developments which would be better located elsewhere on land already occupied by empty office blocks and disused buildings.

2) The road network is not supportive of so many building projects - especially Three Farm Meadows. How are all the people who live in these houses going to travel to work, school and local amenities. Already the A3 is solid every weekday morning. Junction 10-12 of the M25 are the busiest junctions on the M25 with traffic queuing back for miles every rushhour. Already the Horsleys face an overwhelming amount of traffic diverting from Junction 9 at Leatherhead and travelling through the village to get to further up the M25. Juggernauts and large busses travel through our village at astonishing levels. These roads are narrow and ill equipped to deal with such traffic. The huge increase in traffic which would be created by developments cannot possibly be supported by our local roads and lanes.

The local train stations carparks (Effingham and Horsley) are full every morning. Where are more travellers going to park? Where is the local public transport network? Last week I witnessed a bus grounding itself twice coming out of station approach. There just isn’t the space and capacity to deal with yet more commuting traffic.
Schools and Surgery - The local schools and doctors surgery cannot support a bigger intake. Already our villages have children who are unable to access their local school despite living in the catchment area. Car parks at the surgery are full to capacity. The Doctors are over worked and the national problem of recruiting GPs does not bode well for being able to cope with a large increase in local residents.

3) The water table in this area is higher than average. The roads are continually flooding and driving is hazardous with some roads, such as East Lane/The Street, frequently closing during heavy downpours. We have cheap road surfacing (such as that which was completed in Forest Road recently) which doesn’t last and the number of potholes frequently opening up is horrendous.

4) The current use of our roads by hundreds of cyclists needs to be taken into account. Cyclists flock to our area throughout the year training for Ride London and wanting to experience the Olympic route. Although not a problem in themselves, this should be taken into account when assessing the impact of any new developments on road usage. We continually have cycle teams and clubs riding through our roads - sometimes strings of 30/40 and the impact of these on local residents cannot be understated. Most residents are perfectly tolerant but more traffic would certainly involve more danger.

5) Air pollution is a real concern for anyone living in close proximity to the M25 and A3. This will also be a concern for residents of any new development at 3 Farm Meadows and may affect the rationale of building a school on that site. With child asthma and breathing related illnesses on the increase and parents choosing to move to the countryside to avoid the risk of their children developing these, it seems to be totally contrary to health guidelines to build a new village so close to one of the busiest junctions on the M25 and take away so much of the green space that is such a health benefit to so many.

6) Affordable housing - I have yet to see any affordable housing in the Horsleys and surrounding area. I wonder what is meant by affordable. My son is a primary school teacher. On a salary of £21,000/annum could you guarantee he will be able to afford a house in the area. There have been opportunities to build such houses but instead I see mansion after mansion being erected and small bungalows being turned into huge detached houses. This is not joined up thinking. There is a lot of talk, but not much action in this area. I feel developers are not really interested in supporting the local communities but more concerned with financial investment.

7) The development at Three Farm Meadows has already been rejected by GBC. I wonder why the developers are still permitted to put plans forward. I believe it should be completely taken out of the plan. The amount of time, effort and work for councillors to continually assess the viability of this plan, when it has already been rejected on environmental grounds, which have not and cannot be changed, seems ridiculous. It is a waste of our money to have this project continually submitted and debated.

In summary I totally object to Horsley and the surrounding area being targeted for an unsustainable number of housing projects. To build on Greenbelt land would be a travesty and an unjust act undertaken by the council. Once our precious countryside is built on, it can never be returned to what it was. There is no need for it and housing needs can and should be met through other projects in areas which already have the infrastructure to support them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisley Airfield

We don’t think this is a suitable site for a large new development since it suffers from considerable noise and air pollution from the traffic around the A3/M25 junction. In our opinion this site is not convenient for commuting to London from ‘local’ train stations and would put many more car journeys on our hard-pressed roads. We note that the developers are hoping that bus services will provide some help; we don’t believe the local bus companies are viable enough to support their current rural routes let alone add to them. Basically any development in this area cannot rely on public transport and will generate an enormous number of extra car journeys which the local roads and infrastructure cannot support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2599  Respondent: 8803969 / David Scotland  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2010  Respondent: 8804417 / Vivian and Philip Markley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
<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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<tbody>
<tr>
<td>1. Wisley /Ockham development</td>
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<tr>
<td>The proposal for over 2000 dwellings with traveller, retail and commercial sites, under 2 miles away from the Horsleys, would be an environmental and social disaster for the Horsleys, putting an impossible and unacceptable pressure on the village facilities, including the transportation links (rail and road).</td>
</tr>
<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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</tbody>
</table>

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Comment ID: PSLPS16/1613  Respondent: 8804897 / Alan Goodfellow  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT to the proposed development at Wisley This land is in the Green Belt currently and there are no exceptional circumstances to allow this development. Guildford B.C. have already refused permission for this site as it failed to meet a lot of criteria. I believe that for this and reasons stated in my last paragraph this site should be taken out of 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: PSLPS16/1900  Respondent: 8805249 / Peter Warburton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.  
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.  
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.  
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1619  Respondent: 8805249 / Peter Warburton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are some small changes made in the revised Local Plan to Site Policy A35, Land at Wisley airfield in Ockham. However, these changes do not provide any justification for continuing to include this site within the revised Local Plan.

Having made a downward revision to its housing targets in the revised 2017 Local Plan draft, GBC is proposing to remove a number of development sites that were included in the 2016 version of the plan. The largest site removed is addressed by Site Policy No. 46 located in Normandy (‘Land to the south of Normandy and north of Flexford’) where a mixed used development of 1,100 homes had previously been proposed.

In rejecting a 2015 planning application for development at the Wisley site (proposed in advance of the Local Plan) GBC identified no less than 14 reasons to justify their rejection of the planning application, only one of which was the issue of it being in the Green Belt. The reminder highlighted a long list of deficiencies associated with this proposed development including its major impact on traffic flows, its severe environmental impacts, its total lack of existing transport and other infrastructure, as well as many other factors. According to GBC’s consultation website, a total of 1,429 comments were registered in the 2016 Local Plan consultation about the Wisley airfield site – 97% of them were against its development. And yet GBC chooses to maintain Wisley airfield as a policy site in the 2017 revised Local Plan.

With a planning appeal due to be heard in September 2017, I trust that if the planning inspector decides to reject the appeal of Wisley Property Investments, then GBC will finally listen to the views of so many of its residents, accept the AECOM sustainability conclusions on the deficiencies of this site and remove Wisley airfield entirely from the Local Plan.

I OBJECT to Site Policy A35, the creation of a new settlement at the former Wisley airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2168  Respondent: 8806209 / Jane Halliwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I live within a few hundred metres of the proposed development at Three Farm Meadows.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) in the Local Plan. A planning application for this site has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration the planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, and cause further problems on roads locally and through Ripley Village.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the lack of consideration for the need for good public transport to service this and the other developments in the immediate area. The railway stations at Effingham Junction and Horsley will not be able to cope with the increased need for transport to London and Guildford and the car parks are already at capacity. Cycling would not be a safe option since the roads in the area are narrow, have no pavements and no space to provide cycle lanes.

I object to the fact that a large proportion the proposed new housing appears to be in the immediate localities of Ockham, Ripley, Send and the Horsleys.

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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:</th>
<th>PSLPS16/1186</th>
<th>Respondent:</th>
<th>8806305 / Laurence Cook</th>
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3. Three Farms Meadow site

I OBJECT to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.
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:</th>
<th>PSLPS16/1234</th>
<th>Respondent: 8806849 / Roland McKinney</th>
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I object to the choice of this site.

It is a green belt site and much of it is categorised as good agricultural land.

This development would cause great harm to the green belt through inappropriate development.

An air pollution surveyed revealed high levels of pollution near this site, and the GBC sensor located close to the site is close to or above the legal limit for NO2. It is an entirely unsuitable site because of air pollution. If it were chosen, GBC would be open to future claims for compensation from anyone on this site who developed illnesses that could be related to air pollution. As there is no AQMA on or near this site, as there should be, the legality of choosing this site is questionable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Site objection.pdf (617 KB)

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6122</th>
<th>Respondent: 8807041 / Alcis Ltd (Tim Buckley)</th>
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I live near an any already overwelmed choke point at the cross roads between Effingham common road and Forest Road, near Effingham Junction station. In the morning and evening this is clogged, the idea that building another 2,000 homes on Wisley airfield, many of who’s owners will drive to the station, will not have a significant detrimental impact on the lives of the current population is incorrect. The idea that putting in traffic controls will be sufficient to cover this up is incorrect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>I have to say that including Wisley Airfield will be the ruination of the Horsely’s and surrounding areas Already Ockham Rd North &amp; South is unable to take large vehicles These vehicles cannot pass one another without using the pavements of which we have very limited amount Solution Build NEW TOWNS as per Crawley, Milton Keynes, and Stevenage</td>
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<td>I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. You are well aware from previous correspondence that there are numerous specific reasons why the proposed development on this site is unsuitable and you yourselves refused the development proposal unanimously very recently. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.</td>
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<td>I object to the proposed development site Of the Three Farms Meadows A35. This has been previously rejected by the Guildford Planning Committee on 14 separate grounds. This site should be rejected once again for all of the previous reasons it was rejected.</td>
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I object to site A35 Wisley Airfield. Yet another massive 2000 home development that is inappropriate and unsustainable and again in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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<td>I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt</td>
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<td>We have noted the amendments, however the proposed mitigation in Requirements (4) and Policy 43a below is totally inadequate to avoid excessive traffic on the existing country lanes – please see Para 3 (d) of Ref A. Planning application 15/P00012 was refused by GBC for very good reasons and it is unreasonable to retain Policy A35 in the Draft Local Plan. There could be more appropriate uses for the land, such as sports and leisure facilities, including minimal staff housing.</td>
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I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1608  Respondent: 8818689 / Janet Tipper  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Secondly your intention to build over 2000 new houses on wisely aerodrom is unacceptable: the road infrastructure surrounding this site is unsuitable, being narrow, winding roads, effingham and horsley stations have no spare capacity and parking or spare seating on their trains which are already full by 8am; and the land itself is a valuable green space and a haven for wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/416  Respondent: 8818753 / Chris Bussicott  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

And that brings me to the elephant in the room; the proposals for Wisley airfield. All of the objections raised above also apply there, but multiplied by four times as many proposed houses with a couple of miles of the Horsleys. Once again, no provision for schools, medical facilities, public transport, roads etc etc.

This is a disastrous proposal that risks irreversibly damaging a truly beautiful part of Guildford borough. There is no evidence that the real impact has been thought through adequately, and those elected members and officers involved need to take a long, hard look at themselves and their motivations for putting forward what is so obviously a badly flawed plan. Instead, I urge you to revisit the possibility of brown field development, finding locations in the borough that offer the opportunity for local jobs, education and medical capacity, and transport infrastructure. This is not nimby-ism, this is simply asking you to address the GBC local plan in such a way that provides sustainable development without throwing up houses on unsuitable pieces of land, simply because they appear to be 'underdeveloped'.

You will have seen my letter raises a number of direct questions. I look forward to a detailed response to these so that I can better understand why GBC are promoting what appears to me, as a local resident, to be a simply terrible plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I strongly object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am deeply concerned that the Council has produced such a poor quality document for discussion, submission plan is unsound due to the number of errors in the plan, try fails to address the concerns of resident, which have been clearly aired on numerous occasions, it lacks transparency in the evidence base, the accessibility of the evidence base, including the fact that huge files have again been used and these are not accessible to those with poor internet connections. There is also considerable lack of clarity and coherence. Whether this is just very poor work or deliberate obfuscation remains to be uncovered.

I am also seriously concerned about the Council’s past track record of making inappropriate decisions, its willingness to be manipulated by property developers and builders and the scope for corruption and considerable financial gain for unworthy individuals.

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:
1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow, unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
12. Opportunity (3) should be common to all sites and is not unique to this site.
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
16. I object to the removal of additional 3.1 ha from the green belt without any justification.
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

Additionally, the Council has failed to ensure that Surrey University needs to provide student accommodation on its own land, rather than losing valuable, appropriately situated housing stock for Homes of Multiple Occupation, which are the temporary residences of a transient population of students who have no commitment to the communities in which they live, and who make demands on Council services whilst not paying any Council Tax.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and thoroughly unfit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2020  **Respondent:** 8821025 / Karen McQuaid  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Allocation A35**

I OBJECT to the re-inclusion of this site in the Local Plan. This application was unanimously rejected by Guildford Planning Committee on 8th April 2016. This is a Green Belt location and under the NPPF no exceptional circumstances have been demonstrated to remove it from the Green Belt.

It has been misrepresented as brownfield land – less than 15% is brownfield, it is adjacent to an SPA and therefore within the 400m exclusion zone for housing. The remains of the runway are a habitat for rare flora and fauna. It is close to RHS Wisley and Thames Basin Health Special Protection Area. It is also an SSSI and SNCI. There will be a loss of high quality agricultural land (55% of the site) in breach of national policy.

It poses an unacceptable threat to the historic rural village of Ockham and will blight the properties there. There are some 159 residences in Ockham with narrow lanes, no streetlights, very few pavements and many listed houses.

Air quality concerns have not been taken seriously – air pollution at the junction of the A3/M25 is already in excess of EU permitted levels. Additional traffic will exacerbate this situation impacting the health of current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
It will have a detrimental impact on transport, local roads and road safety. This location is isolated and therefore residents will be reliant on private cars. There is already severe congestion on the Strategic Road Network of the A3 and M25.

There is a lack of suitable public transport. Railway stations at Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

The neighbouring villages of West and East Horsley are already at capacity. The local schools are oversubscribed, the medical centre overstretched and the local roads could not cope with extra volume of traffic. Parking is restricted and very difficult at times and there is little or no scope for improvement.

Serious concerns have been raised about this site by Highways England, Thames Water, NATS and the Environment Agency.

This site should be immediately withdrawn from the Draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td><strong>I object to the Wisley Airfield Development</strong></td>
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<td>2) The impact on surrounding villages would be very determined and the infrastructure could not cope.</td>
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<td><strong>is Sound? ( ), is</strong></td>
<td><strong>Legally</strong></td>
<td><strong>Compliant? ( )</strong></td>
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<td><strong>I have attended consultation meetings and little change to the amended plan.</strong></td>
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<td>Although sites A36 and A41 are removed I have serious objections to the amended plan for Wilsey airfield and remaining sites.</td>
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<tr>
<td>Previous objections affecting our villages remain (Roads to small, air pollution, infrastructure etc)</td>
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</table>
I will continue to object to boundary charges and inset in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2810  Respondent: 8821377 / Marion Garrett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although sites A36 and A41 are removed I have serious objections to the amended plan for Wisley Airfield and remain sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/136  Respondent: 8823553 / Rick Day  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

This development will be a dormitory town unless proper access to AND FROM Guildford is provided; an on slip at Old Lane is not sufficient. Existing access is of course fine for London and M25. Also a new A3 on slip road will attract additional traffic and has to be allowed for on Old Lane and Forest Road. Ockham Road North is already prone to flooding near the roundabout (and elsewhere) and so perhaps is not best suited as the PRIMARY access road.

The provision of so much housing will stress the adjacent villages. Provision has to be made to provide additional parking at Horsley and Effingham rail stations OR to provide proper connecting bus services. These need to be shuttle services with a frequency of 10 minutes or less or timed to properly interface with rail services or people will not use them. Otherwise there will be significant increase in traffic congestion especially at East Horsley with its role as "District Shopping Centre". The proposed 2000(!) dwellings is in fact LARGER than all of East Horsley and should even a small percentage of households be attracted to East Horsley to shop will totally change the nature of the village. Then perhaps it will become the suburban centre that the Council has been keen to designate it. Might it not be better for the new development to be the district centre and adequate retail units provided?

Has the security impact on the VOR and Heathrow stack from so many houses been adequately covered?

It is amusing to see reference to

- "Sensitive design at site boundaries that has significant regard to the transition from village to greenfield"

when the impact on the inset villages from Policy S2 is likely the exact opposite.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4604  Respondent: 8824865 / Costa Theo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. 2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. 3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. 4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). 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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3963  Respondent: 8825377 / Jane MacIntyre  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I also object to other large proposals such as the 2,000 house development at Wisley Airfield which is included in the draft plan despite being rejected by the Planning Committee only this year. This makes no sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3765  Respondent: 8826593 / Gilbert McClung  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
6. Additional Objection

I object to the continued inclusion in the Local Plan of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8827169 / Mark Blowers</th>
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<tr>
<td>I object to the proposal to develop the site at Wisley airfield. The small changes in the revised local plan for this proposal are still not acceptable. This application was rejected in 2015 and the small changes do not address any of the issues that were identified at that time.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Wisley Airfield Policy A35</td>
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<td>I OBJECT to the inclusion of Wisley Airfield development in the local plan. No exceptional circumstances have been demonstrated for its removal from the Green Belt. This proposal has also been unanimously rejected by GBC’s planning committee because of grave concerns including traffic congestion, air pollution, lack of suitable public transport, unsustainability, the inappropriateness of an urban style development in this rural area, the major impact on local villages. These are all still relevant objections.</td>
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<td>Respondent: 8828353 / Claire Richards</td>
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<td>I object to the development of an over 2,000 house village at Ockham (former Wisley Airfield) as this will have a fundamental impact on the Horsley’s with such a huge range of mixed housing, retail, commercial and traveller sites. This along with the extensive developments at Burnt Common and Gosden Hill Farm (Burpham) will put an enormous strain on the road infrastructure on this side of Guildford.</td>
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<th>Respondent: 8831521 / Denis Coulon</th>
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<td>I object in particular to the removal of the Former Wisley Airfield from the Green Belt. Development on the site will create an urban corridor from London to Guildford.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, and that air quality concerns have not been taken seriously. I object to the continued inclusion of a site (the former Wisley Airfield) where the planning application has already been unanimously rejected by GBC’s Planning Committee. Serious concerns have also been raised about this site by a number of authoritative sources, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the former Wisley Airfield, Allocation A35, is removed from the Local Plan.</td>
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| Comment ID: pslp172/3750 | Respondent: 8831521 / Denis Coulon | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc). There are no plans to alleviate the sudden increase in traffic on these narrow country lanes that would result from this new development.
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract thousands more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis. Parking facilities at the Horsley and Effingham stations are totally unfit to accommodate the onslaught of new vehicles from this proposed development.
9. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.
10. I object to the removal of additional 3.1 ha from the green belt without any justification.
11. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
12. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
13. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
14. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to OBJECT to the Local Plan presented by Guildford Borough Council.

The inclusion of the Former Wisley Airfield site is unrealistic in its size and location. All the roads in this area are narrow, unlit and do not have footpaths. How can we envisage that residents will walk or cycle two miles to the nearest station, or that children will be allowed to cycle four miles to school on narrow country lanes? This plan is unworkable. The impact on traffic on the A3 even if the M25 junction 10 is improved, would be huge and unworkable. The traffic would also impact on an already poor air quality in this area.

The proposed Wisley Airfield site is in the Green Belt and not appropriate for housing, the local plan should ensure that affordable housing is located into the future in town settings where workplaces are within walking and cycling distance.

The impact of extra housing so close to the TBHSPA will have an adverse effect on the protected site, both by numbers of people, air quality and increased traffic. The present airfield has many priority and protected species of birds which feed on the arable fields, which are the main areas on the old airfield site, the hardstanding is less than 15% of the whole site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/3432  **Respondent:** 8831681 / Helen Cowell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the local plan, particularly in regard to the former Wisley Airfield site which I believe is allocation A35.

The site is in such a position where local roads are very narrow and have no footpaths or cycle paths or indeed any way of adding them. Any housing on this site would be reliant on cars and could generate at least 4,000 car movements a day, the A3 and J10 of the M25 cannot cope with this additional traffic, even with the proposed changes to J10. When events are held at Wisley RHS gardens the roads are solid and they intend to increase visitor numbers by 500,000 per annum.

The site is greenbelt, it is farmland and it adjacent to the TBHSPA which would be over run by dog walkers and further affected by already high pollution levels.

Current studies show that young people and downsizers want to live in towns where they can walk to work, walk to train stations and out in the evenings to leisure facilities. All households on this site would need to drive daily for both work and leisure. The site is in isolated green belt farming country. For the developers to suggest that people could walk or cycle to the station is nonsense, this site is in the wrong place 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:** PSLPS16/2068  **Respondent:** 8832513 / Richard Russell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Site A35: Three Farms Meadow, Ockham: (2000 houses)

I **OBJECT** to both the inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham) and the proposal to build 2000 new homes on it. The impact on the nearby villages of West & East Horsley (less than 2 miles distant) and of course Ripley of an additional 5,000 cars (plus associated additional traffic such as couriers, supermarket deliveries, buses etc) would be catastrophic. There is no room to park NOW in either of the Horsley villages or at the local stations in Horsley and Effingham and so a development of this magnitude would be calamitous.

Furthermore, the impact of an additional 5000 cars, all using the Ripley Roundabout for egress and access (not to mention an additional 5000 from the site proposed at Gosden Hill Farm (Policy A25), would simply magnify exponentially the major traffic flow problems that exist NOW. The nearest railway stations to this proposed site are those of Horsley and Effingham Junction; both of which are full to overflowing NOW and have no space available for enlargement. As is already evident NOW, anybody who attempts to drive towards the A3 / M25 from West / East Horsley, Send or Ripley during the rush hour faces a daunting proposition because not only is the A3 slip road (going northwards) at a virtual standstill but so is the A3 to the extent that the A3 traffic coming from the Guildford direction will be backed-up for several miles. Equally, the local village shops of Ripley and East Horsley have major parking problems NOW and would not be able to cope with the additional cars associated with this proposed development.

Following a major public outcry, GBC’s Planning Committee rejected unanimously a recent application for this development on numerous grounds yet, for no apparent reason, it has been included in the new Draft Local Plan – a clear invitation to the developers that they should try again. This is not a NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who have already been given many additional months to refine their application prior to its rejection. It is therefore my opinion that this development should be removed from the new Draft Local Plan for all the same reasons that it was rejected by GBC’s Planning Committee on 6th April 2016. These include:

- **Green Belt location and absence of “exceptional circumstances”**.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- **Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA)**.
- **Proximity to A3/M25 bottleneck and Ripley village and roundabouts**.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating 2,000 dwellings within the village of Ockham’s 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- **Impact on listed buildings**.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- **Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14)**.
- **Failure to evaluate the cumulative impact of this and nearby development sites on the area**.
In closing, permit me please to thank you and your colleagues for providing me with the opportunity to respond to this new 2016 Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Trifolium striatum</td>
<td>Knotted Clover</td>
<td>Surrey Scarce</td>
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It is adjacent to Elm Corner Wood and Hunts Copse both Sites of Nature Conservation Importance and in the proximity of a Thames Basin Heaths SPA of Ockham and Wisley Commons Site of Special Scientific Interest. The development would be a disaster for the area 2000 homes would be 6000 people, 12000 feet destroying the area.

The council has already rejected the development proposal for the site for the following reason:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

But as reported in the national press the CEO of the Cayman Island Company (which have three major player from the Tory party including an former minister connected to it) who owns the land at Wisley, made a donation of £100,000 to the Tory party and then the site is back in the local plan. One can only wonder how this can happen, possible a phone call from central Office to its supports on Guildford Council? The company seem very sure they will get their approval because at the local cinema’s they are showing a short film during the adverts extolling how wonderful the development will be.

**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>PSLPS16/6216</th>
<th>Respondent:</th>
<th>8837185 / Roger Maude</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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I object very strongly to a plan that proposes that over 70% of new housing be built within the Metropolitan green belt when there is ample brownfield land in the urban areas which needs to be regenerated. Also it is ignoring election manifesto promises.

I particularly object to the inclusion of the former Wisley Airfield where after 14 months of consideration Wisley Property Investments Ltd’s planning application was unanimously rejected by GBC on 8th April this year on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources including Highways England, Thames Water, NATS and the Environment Agency.

I also object to the threat the local plan poses to the historic rural village of Ockham and the blight on properties there. A 2,000 + dwellings development, with urban-style buildings up to five stories high and a population density higher than most London boroughs will have a detrimental impact on transport, local roads and road safety. I specifically point out:

1. The assertion that the development will result in a meaningful shift to cycling will not be born out as the development is too isolated and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The narrow rural roads and farm land will be completely incapable of sustaining what would amount to an extra 5000 people and 4000 cars.
3. The increase in the already severe congestion on the A3 and M25, a further planning application at RHS Wisley and a proposed 600 pupil secondary school on the site would add additional congestion on the A3/M25 junction as well as on local roads and be a serious danger to local cyclists and pedestrians.
4. There is a lack of suitable public transport in the area and the local railway stations at Effingham and Horsley cannot cope with the proposed increase in passenger traffic where car parking is already at full capacity.
5. Air quality concerns have not been taken seriously and there is a threat to wildlife in an area where there are many protected species.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object very strongly to a plan that proposes that over 70% of new housing be built within the Metropolitan green belt when there is ample brownfield land in the urban areas which needs to be regenerated. Also it is ignoring election manifesto promises.

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5. Air quality concerns have not been taken seriously and there is a threat to wildlife in an area where there are many protected species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
• Former Wisley Airfield, Site A35

a) The flawed GBCS stated that the former Wisley airfield only conforms to two of the Purposes of the Green Belt. This is incorrect. These Purposes are:-

1. To check the unrestricted sprawl of large built-up areas. This site prevents the sprawl of Weybridge/Addlestone/Byfleet towards Guildford and the sprawl of Woking towards Leatherhead.

1. To prevent neighbouring towns merging into one another. Wisley lies between Guildford, Woking and Cobham as well as between Byfleet and Horsley.

1. To assist in safeguarding the countryside from encroachment. This is precisely why the site should NOT be removed from the Green Belt.

1. To preserve the setting and special character of historic towns. Ockham is a very ancient Parish comprising of nine separate settlements with the former airfield at its centre. The village has numerous Listed buildings including its Grade 1 church and three Conservation Areas. The site is an integral part of a rural extended village.

1. To assist in urban regeneration, by encouraging the recycling of derelict land and other urban land. Over 70% of the site is high quality agricultural land which has been brought back under cultivation since World War II, before which it had been farm land for centuries.

b) I particularly object to the change in the revised draft Local Plan extending the boundary of the former Wisley Airfield site to include land lying to the south of the site bordering Ockham Lane and Hyde Lane. Taking this extra area of land out of the Green Belt is totally unnecessary and is simply a move by the Council to enable the airfield owners to secure planning permission for the massive housing development they wish to build. Not only will the Green Belt boundary now be adjacent to the eastern end of the Ockham Conservation Area but it also borders on another Listed Building, Bridge End House.

The Strategy and Sites document states on page 205 "Setting of listed building on boundary". This is now incorrect as there are TWO listed buildings on the boundary, namely Yarne and Bridge End House.

Ockham Lane is a narrow winding lane with blind bends, no street lighting and limited pavements. It would not be able to cope with increased vehicular traffic from the development.

c) The housing density planned for the development is totally out of character and inappropriate for the Parish of Ockham. It is more akin to the density in an inner city site.

d) The proposal to build four and five storey buildings along the spine of the development is inappropriate bearing in mind that they will be visible for miles around to the east, west and south. Again, this would be totally out of character in a rural community.

e) Part 2 of the Strategy and Sites document proposes that a "bus network to serve the site" would be "in perpetuity". Such a statement is unrealistic and unenforceable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The need for new housing in Guildford Borough is predominantly for affordable housing. The former Wisley Airfield, being a rural site within Ockham Parish, is totally unsuitable for this purpose and there is no guarantee that the developers would adhere to an undertaking to build up to 40% affordable houses. After all, "up to 40%" could be just 3%!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6428  Respondent: 8837281 / R Brind  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The comments made in response to the earlier Draft Local Plan were largely ignored by GBC Councillors. I trust that the Council will listen to their electors this time round

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3126  Respondent: 8837377 / J Fisher  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley Airfield would make the A3 and all the surrounding roads impossible to use – just do a serious traffic study you will see.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7625  Respondent: 8837729 / Harry Clarke  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. Policy A35 (Wisley Airfield) – Object

1. In breach of the NPPF, which states “Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and … unless the need for, and benefits of, the development in that location clearly outweigh the loss”. There are large negative benefits to the locality if the development was permitted to proceed as outlined below. Irreversible damage to the heathland habitats at Wisley and Ockham Commons will occur if this development is permitted to proceed as outlined below.

2. Pollution is already over legal limits at Junction 10 of the M25, and has been for the last five years! The development can only increase the level of pollution in the area, thus resulting in the severe harm to residents and drivers in the area. Pollution must be reduced to below legal limits before any development could be considered. And must be kept below legal limits after any development.

3. Traffic congestion. Junction 10 of M25 and the A3 already suffers from major congestion. The extra traffic would cause extra congestion. This will result in significant economic loss, not only to the borough, but also to the country.

4. Irreversible damage to Wisley and Ockham Commons through pollution of the ground from nitrate deposits from the traffic fumes. This is contrary to the Councils legal duty to protect SPAs.

5. Loss of biodiversity due to increased visitors to SSSI and SPA sites.

6. Development within 5km of Thames Basin SPA, with totally inadequate mitigation measures in place.

7. Loss of Green Belt land

8. Inadequate access to public transport, such as the railway network. Lack of space in car parks, which are already over-flowing.

9. Increase bus traffic along narrow country lanes, which are unsuitable for such traffic (e.g. BT2 and BT3)

10. Increased traffic congestion along Effingham Common Road, causing unacceptably long travel journeys. Traffic during the rush hour is already very bad.

11. Increased danger to walkers due to massive increase in road and cycle traffic.

12. Increased barriers to wildlife moving between protected sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3520  Respondent: 8839553 / David Burnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to A35 Wisley Airfield

Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers, who are based in the Cayman Islands and not local, to try again. This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including, Green Belt location and absence of “exceptional circumstances” and misrepresentation of the site as
brownfield land. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it. It would result in the loss of high-quality agricultural land (55% of the site), in breach of national policy.

I find this policy contrary to NPPF 84, which encourages channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt.

I find this policy contrary to 87 & 88 due to the fact that ‘Very special circumstances’ have not been met.

There is an absence of adequate traffic data. This development would increase air pollution to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school. There is a lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.

Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households. Extreme housing density with tiny garden spaces has been proposed, out of keeping with existing homes in the area. The nature of neighbouring communities would be damaged by the creation of a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

There has been Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the continued inclusion of a site A35 (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3525  Respondent: 8840193 / David K Reynolds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal for the massive development of the former Wisley airfield, the effect on the Horsleys and Ockham would be enormous. How GBC can put this back in the plan when it was unanimously refused just a few months ago is beyond me. It appears your previous decision was worthless?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6540  Respondent: 8840193 / David K Reynolds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

- We object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

We reflect objections from our family and friends who regularly visit us and benefit from the current surroundings and are acutely concerned about the changes proposed.
We trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

• We 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.
  ◦ We object to the detrimental impact on transport, local roads and road safety. We specifically object to:
    1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
    2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
    3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
    4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
    5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
    6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
  ◦ We object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
  ◦ We object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
  ◦ We 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.
  ◦ We object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
12. Opportunity (3) should be common to all sites and is not unique to this site.
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
16. I object to the removal of additional 3.1 ha from the green belt without any justification.
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3230  Respondent: 8840257 / Nicola Theo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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: PSLPS16/3231  Respondent: 8840257 / Nicola Theo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The first relates to Three Farms Meadow, Allocation 35. I object on the following grounds:

- This area is currently Green Belt, and I believe that the green belt should be protected. It was established to stop exactly the kind of urban sprawl that the Local Plan is now proposing in Three Farms Meadow.
- The number of houses proposed is many more than any of the local infrastructure can support, even if developed in the ways suggested - including roads, public transport and utilities.
- Ockham is a small hamlet - it will be utterly swamped by the Three Farms Meadow development. We love Ockham because of the wide open spaces and the beauty of the area - a development of this scale and type (urban) would irreversibly change the nature of the village and surrounding area.
- This plan has already been unanimously rejected by GBC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on
the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5420  Respondent: 8842817 / Simon Charles James Connolly  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My reasons for objecting are as follows -:

1. This site is not sustainable in this and previous versions presented due to the location.
2. Rail stations are further than any other identified strategic site which will result in more congestion in the surrounding area’s which will impact greatly on the many narrow winding unlit roads, making those who wish to walk or cycle unsafe. This is totally unrealistic.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. It is adjacent to the very popular RHS at Wisley where visitor numbers will increase by 500,000/annum. The traffic increase from the RHS has not been taken into account.
5. The traffic increase due to commuters travelling to Woking Rail Station has not been taken into account.
6. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
7. Opportunity (3) should be common to all sites and is not unique to this site

8. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

9. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

10. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

11. I object to the removal of additional 3.1 ha from the green belt without any justification

12. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

13. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

15. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

16. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

17. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

18. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

19. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

20. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

21. I object to the inclusion of a 10% buffer in the housing number over the plan period. Which is totally unnecessary.

22. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

23. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

24. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

25. 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.

I would like consideration to be taken for the reasons I have listed above that this plan is unsustainable and is not fit for purpose.
I object to Policy A35 Wisley. I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. The site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again and a clear sign the council is keen to push forward sites which are not suitable. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. It seems to me that this is predetermination in favour of this specific application unlike the Howard of Effingham previous site which lost its planning application and has rightly been removed from the plan. I am very concerned by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers who’s a Cayman Islands company. A director of the previous owner of the site is now acting as its promoter who is also a Conservative councilor in Oxford. The person managing the land is also a Conservative Councilor from Windsor. All very questionable in my opinion. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisley Airfield. The current proposal would destroy the village of Ockham. In effect the proposal is for a New Town with houses and blocks of flats packed close together on a density scale more appropriate to an inner London borough. The surrounding roads are totally inadequate to cope with the additional volume of traffic that this would generate. Again this site is largely Green Belt and development on the scale envisaged cannot possibly be justified.

I OBJECT to the idea of a "new town" taking over and destroying the village of Ockham and am horrified that such an intense use of land for housing units can even be contemplated outside of a major city.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1581  Respondent: 8845729 / John.P Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The idea of a new township on Wisley Airfield was, and continues to be a very and idea. GBC has already objected to a planning application for the Wisley site and presented fourteen reasons to justify its position, only one of which was the fact that the site is in the Green Belt. Despite this GBC has kept the Wisley Airfield site as a 'policy site' in the revised plan.

I OBJECT to the continued inclusion of the Wisley Airfield site in the revised 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: PSLPS16/636  Respondent: 8845825 / John Gould  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

You have rightly rejected the latest Wisley Airfield plans, but then continue to include it in your latest plan! I think that the actual brown field area there is suitable for a small housing development (one to two hundred houses), bringing Ockham up to a viable village size. The traffic could be routed through the village, rather than dangerously onto the A3. You also need to realise the impact on the internationally important RHS Gardens.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2125  Respondent: 8846177 / Moira Tailby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity already and further traffic is simply unsustainable and will make residents lives a misery.
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded roads and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. The proposed development is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS such as the very popular craft fairs, which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work away from the development. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design.”
11. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
12. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
13. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
14. I object to the removal of additional 3.1 ha from the green belt without any justification.
15. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
16. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
17. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
18. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees. It is extremely disappointing that the local Council sees fit to ride roughshod over local public opinion.
19. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
20. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
21. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
22. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
23. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
24. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations which have consistently been against the development.
25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
27. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

28. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

29. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

30. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

31. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

32. 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.

33. The development is too large for the area and locality. A smaller development on the existing runway and concrete apron (a brownfield site) would be more appropriate and also come on stream more quickly.

34. The size of this proposed development is inappropriate in the Greenbelt and no exceptional circumstances have been demonstrated.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2402  Respondent: 8846849 / David Berliand  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London.

Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2405  Respondent: 8846849 / David Berliand  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where
the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL)
planning application was unanimously rejected by GBC on 9th April 2016 on the recommendation of GBC Planning
Officers, who cited the "same grave concerns highlighted in this letter. Previous concerns about this site have also been
raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and
the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms
Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1434  Respondent: 8847169 / Kelly Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

The Proposed Wisley Airfield site should have been instantly removed from any future development, having been
unanimously turned down in the last 2 months by GBC. To add another 2000+ homes and probably over 4000 cars on the
already bottle necked A3/M25 junction is madness, not to mention the unsustainable pressure on all local services, from
parking, public transport, schooling, doctors etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/996  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( No )

I object. It's Green Belt (NPPF 89). What are the exceptional circumstances that require this site to be developed?

It is within 5km of the Thames Basin Heaths SPA, and therefore any development is subject to EU/UK legislation (NPPF
119). The impact cannot be mitigated with SANGs because there is no evidence base to support SANGs as required by
NRM6 viii, NPPF 158 and 166.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1462  Respondent: 8850433 / Ian Doherty  Agent:
Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and have objected to prior planning applications at this location. In addition to the issues raised above relating to Junction 10 of the M25 and the lack of parking at both Horsley and Effingham Junction stations, I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

*I strongly OBJECT to Policy A35.*

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1773  **Respondent:** 8850433 / Ian Doherty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly OBJECT to this proposed policy for the reasons detailed in this letter.

a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under 'very special circumstances'. GBC's Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances* such as to clearly outweigh the harm to the Green Belt and the other harm identified.

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers' previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon 'exceptional circumstances', which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a 'first line of defence' against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.
b) This site does not meet acceptable levels of sustainability:

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC's consultant, AECOM, is presented in the Local Plan Evidence Base report 'Sustainability Appraisal (SA) of the Guildford Borough Local Plan' issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional 'traffic light' system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as 'Red' by AECOM for this site, more than any other large site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1789  Respondent: 8850433 / Ian Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

- There are presently no schools, medical services or shops within walking distance of this site;

- There is presently no local employment at this site and little after the development is completed;

- There will be a significant destruction of agricultural land arising from this development; There will be significant environmental damage from this development;

- There is no public transport currently serving this location;

- The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity available.

- Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being 'sustainable';

- New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC's own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.
c) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley's two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding 'lanes' - a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley's through roads. Many of these 'lanes' are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these 'lanes'.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

d) There are damaging health & safety implications arising from development at this site:

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide ('NOx') emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the "failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition" as one of the grounds for this rejection.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications.

e) The environmental impact on protected wildlife will be substantial:

GBC's Land Availability Assessment which supports Policy A35 states that the site lies within the 400m-5km 'Zone of Influence' of the Thames Basin Heaths Special Protection Area ('SPA'). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance ('SSSI'), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its 'Thames Basin Heaths SPA Avoidance Strategy'.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an 'Exclusion Zone' where "there will be a presumption against additional new dwellings". Since
the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls
within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - Skm 'Zone of Influence' set out under the SPA policy, which
requires developers to contribute a new SANG ('Site of Alternative Natural Greenspace') to mitigate for potential damage
caused to the SPA from new development -the size of the SANG is a function of the scale of the development. In their
previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their
SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to
allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an
important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, I OBJECT to Policy A35 on grounds of its material adverse environmental impact.

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste
facility, means that the actual area of land available for housing development at this site is estimated to be around 43
hectares.

f) The development is totally out of keeping with local character, context & distinctiveness:

It is a key element of planning policy that new developments should be in keeping with the established pattern of
development in the area. In the 2016 Proposed Submission Local Plan, GBC's very first housing policy, Policy H1,
requires that development should: "make the most efficient use of land whilst responding to local character, context and
distinctiveness." However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create
a new settlement larger than any other in Guildford Borough, outside Guildford itself. The nearby historic village of
Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding
area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste
facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares.
Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated
at around 49 dwellings per hectare (‘dph’).

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town,
with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area.
Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable
size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in
breach of GBC's own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location.
It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously
presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages
have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as
well as a range of residential housing, predominantly detached two storey houses or bungalows. They are all picturesque
villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in
southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if
this development goes ahead.
Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

**Concluding remarks**

I have major concerns about Policy A35. I consider this proposed policy to be a severe contravention of Metropolitan Green Belt rules. It will result in a new settlement of very low sustainability, it will have a major adverse impact on the infrastructure and environment across a widespread area and it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

**Accordingly, I strongly OBJECT to Policy A35.**

In the light of the recent referendum outcome, which will result in the UK leaving the EU, it is inevitable that the population and economic projections for Guildford Borough will need to be reduced.

I presume that GBC will in due course be making such reductions to its proposed housing projections to reflect these changed circumstances. In our opinion, the proposed development at former Wisley Airfield ought to be the very first site in the Borough that GBC should remove from its draft Local Plan as a result of the UK now proceeding to leave the EU.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/738  **Respondent:** 8850465 / Colin Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

>

> The Proposed Wisley Airfield site should have been instantly removed from any future development, having been unanimously turned down in the last 2 months by GBC. To add another 2000+ homes and probably over 4000 cars on the already bottle necked A3/M25 junction is madness, not to mention the unsustainable pressure on all local services, from parking, public transport, schooling, parking, doctors appointments etc.

> What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/4031  **Respondent:** 8850465 / Colin Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Having already voiced my concerns by letter and email previously, I wish to repeat my objections, in particular to the ridiculous and greed driven Wisley "new town development". As outlined previously, the green belt has to be protected, otherwise some of the country's most naturally beautiful countryside will be swallowed up by the march of suburbia.

The traffic problems that will be added at the A3 junction 10/ M25 interchange that I currently crawl through every day, the strain on an already overcrowded Effingham Station, the local villages of Ripley, Ockham and the Horsley's that are already becoming busier on the roads every month, plus schooling, medical centre etc, mean that this development is totally unsuitable for that location.

I appreciate that we all have to do our bit and controlled increase in housing is required, but to dump a population of over 2000 homes, probably adding 5-6000 people is completely unsustainable, as already pointed out by the planning experts and Guildford Council.

The Developers must not win this public enquiry, because it'll be the thin end of the wedge and before we know it, the Surrey Hills will be covered by concrete.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy A35 Land at Wisley Airfield

Previous planning proposals have been a clear contravention of Metropolitan Green Belt Policy. If the proposed 2000 homes are built it will create effectively a new town in the heart of the Green Belt. In order to get sensible access to and within, it will undoubtedly need to damage and use more of the Green Belt, as well as destroying the character of surrounding villages by causing chaos to communities and peoples quality of life.

Comment ID: PSLPS16/1437  Respondent: 8852289 / John F. Wood  Agent: 
Documnet: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to build on the former Wisley Airfield site. This has very recently been unanimously turned down by the Borough Council on 14 different counts and should be removed from the Local Plan permanently.

My specific objections to the Former Wisley Airfield development are as follows:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

3) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4) 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.

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I conclude as I began. I strongly object to the Proposed Local Plan.

HANDS OFF THE GREEN BELT!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6716  Respondent: 8852961 / Mike Fantham  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**The Wisley Airfield development** looks at first sight like a good idea on a 'brown field site' but again, there is no proper provision detailed to counter the impact (eg 3000+ more cars in use!) on the surrounding villages or the other new loads on the infrastructure so, in that sense, it is 'still born' and just a potential blight on the local area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/2590  **Respondent:** 8853921 / J S Hawkins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object most strongly to the draft local plan for the following reasons:

1. I object to the removal of the former Wisley Airfield from the Green Belt. It was always understood that this area would be returned to farmland after the war
2. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. Brown Field land must be used first. It was an election manifesto promise.
3. I object to the disproportionate allocation of housing in this area. 239 of the local plans new housing is proposed around Ockham, Ripley, Send and the Horsleys
4. I object to the density of the housing on planned. It will create an urban environment totally out of keeping with this rural area.
5. I object to the huge increase in traffic this scheme will generate on roads totally incapable of coping. A development of 2068 houses will attract an additional 4000 cars.
6. I object to the additional traffic to the A3 and M25. Both roads can barely cope at the moment.
7. I object to the lack of sufficient public transport. The stations at Horsley and Effingham Junction have no room for additional car parking. The trains at peak times are grossly overcrowded.
8. I object to the fact that as this area is all SSSI and site of Conservation Natural Land. No account has been taken
9. I object to the continued inclusion of the Wisley Airfield site where this planning application has already been unanimously rejected by the Guildford Council’s Planning Committee.
10. I object to the added air pollution and noise which this development will create.
11. I object to the assumption that infrastructure will cope. It cannot. Water and sewerage will be a serious problem
12. There is no major employment in the area. People have to commute - probably by car – to the place of work. Huge traffic congestion will result.
13. I object to the losing a huge quantity of good quality farming land.
14. I object to the developers assumption that 2068 houses will rely on bicycles/buses to get to a station. This is utter nonsense. There are no busses to stations and cycling is out of the question on local narrow roads.
15. I object to the fact that with mixed housing crime will be a problem.

I trust that my objections will be fully considered and that the former Wisley Airfield, Allocation 35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3363  **Respondent:** 8854305 / A_P Latham  **Agent:**

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Section page number  Page 190 of 1393  Document page number  1340
The proposed development of over 2,000 houses at Ockham (on the former Wisley Airfield) would have a huge impact on the Horsleys. This large, mixed, housing, retail, commercial, traveler and schools development in close proximity to the Horsleys would have a severe effect on these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1223  Respondent: 8856001 / Martin Champion  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Historic setting - This proposed settlement would adversely affect an historic setting the area being that of a wartime airfield and later a flight testing centre.

Highway issues - Any new roads or access roads will destroy additional greenbelt land. The development would generate huge numbers of cars and impact dangerously on highway safety at the junction with the A3 and along the A3 which is already busy, crowded and often at a standstill. Additional traffic will make the A3, where it acts as the Guildford Bypass, even more of a dangerous problem that it is now. The A3 will not cope with additional traffic where it can be avoided. It can be avoided by not building a new development of this size here.

There is a lack of public transport to the proposed development. The 515 bus stops on the A3 but too far away to be used by people living on the proposed development. This lack of public transport will be an additional factor in increasing the number of cars on the A3.

It is an inappropriate use of both greenbelt and agricultural land.

The area is a SNCI due to its populations of reptiles and three red list and seven amber list birds which we have a duty to protect. Providing alternative sites for them will not work.

Any benefits derived from the development will not outweigh the harm it would do.

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? ( )

This would be a major development that would have far reaching consequences beyond its immediate vicinity. It would remove a large area from the MGB and replace it with a new town that would dominate the existing nearby villages. The increased traffic generated would overwhelm the local roads, and the existing facilities would be insufficient to cater for the increased population. The MGB provides a Green Belt around London. Locally it separates London from Guildford. Removal of such a large area from the MGB in this intervening open space would fail to assist in safeguarding the countryside from encroachment, contrary to NPPF paragraph 80.

Having regard to the complete lack of existing infrastructure on the site, the lack of public transport, the lack of local employment, the loss of agricultural land that would arise, and the environmental harm caused, the proposed development would be unsustainable.

The impact on the local road network, which consists largely of narrow lanes, would be unacceptable. These roads already cater for a high volume of traffic and cannot reasonably accommodate more. The car parks at both Horsley and Effingham Junction Stations are full and do not have any spare capacity.

While facilities such as schools and medical centres could be included in the development, failure to provide them before the inhabitants take up residence would only serve to harm the already overstretched facilities in nearby villages.

This proposal is totally contrary to Green Belt policy and would have significant adverse effects on the surrounding area and its population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5124  Respondent: 8856993 / Maxine Higgins  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Development at Ockham (Wisley Airfield)

Previous proposals for development on this site have been rejected for a variety of reasons, including the scale of the plans and impact on the local surroundings, not to mention the impact on the RHS gardens at Wisley. Nothing has changed to mitigate these objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6269  Respondent: 8857537 / Tony Heaney  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2. The scale of proposals for the former Wisley Airfield site so close to the Horsleys. The negative impact of such a development would be enormous. Having recently rejected a detailed planning proposal for this site which exposed its total lack of viability this should be seen by the Borough Council as the basis for dropping this proposal in its entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8020  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

I object to Policy A35 Wisley

I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected.

Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.
2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159
10. Cost of infrastructure required to the detriment of alternative more favourable sites.
11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**POLICY A35 WISLEY**

21.1-I object to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Cladon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

21.2-My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

21.3-There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

21.4-This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

21.5-Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on 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:** PSLPS16/1228  **Respondent:** 8858433 / Eric Peters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **Three Farms Meadow site (site A35)**

I object. The re-inclusion of this site is very disappointing following the public outcry for its previous inclusion and the rejection of a recent planning application.

It should be removed as it is in the Green Belt, less than 15% is brownfield and the former runway has never had buildings on it. The former runway is a Special Protected Area.

The infrastructure can't cope with the increased traffic and pressure on services it will create. The cost of improving the infrastructure will mean alternative sites will be more viable if included in the assessment. It is also disproportional to build 2000 homes in a village of 159. It will also have adverse effects on the Horsleys and put pressure on the Horsley station.

I hope you will reconsider the plan and listen to the local people rather than just developers.
Planning objections for TFM site which is allocation A35

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons and I require confirmation that all of these comments together with all my previous comments are passed to the Inspector and reserve my right to appear at the inquiry and present my evidence.

I have below listed my many objections:

- I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
- I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
- I object to the removal of additional 3.1 ha from the green belt without any justification.
- I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
- I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
- I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
- I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
- I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
- I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
- I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
- I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.
- I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
- There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
• The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

• It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

• It is further from railway stations than any other identified strategic site.

• It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10 of the M25)

• Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

• Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

• Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

• It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account and the regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

• It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

• The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

• Opportunity (3) should be common to all sites and is not unique to this site

• I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

• I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

• I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

• I object to the extension of the plan period by 1 year as it has not been identified as a major change

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>pslp172/3773</th>
<th>Respondent:</th>
<th>8858817 / Roger Chamberlain</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</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**? ( )

As before I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

I believe it is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the most popular visitor attraction in the south-east.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”. Opportunity (3) should be common to all sites and is not unique to this site

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the removal of additional 3.1 ha from the green belt without any justification.

Development should be excluded in flood zone 2 and 3 not limited

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. The council has not explained why they think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5419  Respondent: 8858817 / Roger Chamberlain  Agent: 8858817

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Due to the number of errors in the plan, and lack of transparency in the evidence base, the accessibility of the evidence base, including the fact that huge files have again been used and these are not accessible to those with poor internet connections and lack of clarity, I believe that the submission plan is not sound.

I request confirmation that the comments contained in this documents together with all my previous comments are passed to the Inspector.

As before I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

I believe it is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the most popular visitor attraction in the south-east.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”. Opportunity (3) should be common to all sites and is not unique to this site.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

I object to the removal of additional 3.1 ha from the green belt without any justification.

Development should be excluded in flood zone 2 and 3 not limited.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. The council has not explained why they think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.
I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

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.

In conclusion I consider for many reasons not least those listed above that The Local Plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3868  Respondent: 8858913 / Stephen Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

My name is Margaret Carter. I am a resident, aged 95, of Weston Lea, a road in West Horsley where a number of other elderly people also live in the purpose built bungalows. I do not have internet, so have asked my son, who also lives nearby in West Horsley, to send this letter to you using his email.

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them). This is particularly important to pensioners and the aged, such as myself and others who live in Weston Lea. We are only too aware of the dangers posed by the excessive traffic on the village roads, coupled with the narrow or non-existent pavements.
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. The bus service is close to non-existent - a few busses a day to very limited destinations make it of little real use.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

11) I object also on the grounds that the utilities of the village are incapable of sustaining the degree of development envisaged. Car parking at the shops, station and doctors surgery is already inadequate.

12) Finally, I object to the purported Housing Need figures on which the plan is based. These are grossly exaggerated, as reviews have shown. If reliable figures were used the issue of building on the green belt would not arise. The proposals represent a totally unjustifiable destruction of valuable and essential green belt land. The need is for affordable housing on brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A35 - Wisley Airfield

I OBJECT to the removal of the former Wisley Airfield from the Green Belt and to the proposed building on it for reasons given above. Such development has an obvious immediate knock-on effect on the surrounding communities and rural landscape, including the Horsleys. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. This is the major part of the over-allocation of housing in this part of Guildford Borough - 23% of the Plan's new proposed housing being in the immediate localities of Ockham, Ripley, Send and the Horsleys. In effect it is proposing to create a New Town in the heart of the Metropolitan Green Belt with very low sustainability. Above all it will cause the destruction to the character of one Guildford borough's most picturesque and historic villages - Ockham, a hamlet of about 150 houses will be engulfed.

A planning application (15/P/00012) for this site was unanimously rejected by GBC's Planning Officers just before the Local Plan was published and so it is very disappointing to see its inclusion in the Draft Plan. Amongst the 14 grounds for refusal were: Green Belt location, proximity to sites of special protection, proximity to M25/A3 junction and associated noise pollution and air quality problems, lack of local transport possibilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7763  Respondent: 8858913 / Stephen Carter  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the former Wisley Airfield from the Green Belt and to the proposed building on it. Such development has an obvious immediate knock-on effect on the surrounding communities and rural landscape, including the Horsleys. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. This is the major part of the over-allocation of housing in this part of Guildford Borough - 23% of the Plan's new proposed housing being in the immediate localities of Ockham, Ripley, Send and the Horsleys. The assertion that the development will result in a meaningful shift to cycling and walking is risible. It is too isolated, the roads would be too dangerous and, in the modern world, there will inevitably be heavy reliance on private cars. It would be folly to make any other assumption. In this respect, a development of 2,068 homes will result in around 4,000 additional cars on the road in the first instance, possibly more as children grow up and the numbers of cars per household increases. There are no cycling paths, indeed no footpaths, on many, resulting in danger to life and health.

There are important environmental and ecological considerations - the Thames Basin Health's Special Protection Area, Sites of Special Scientific Interest and a Site of Nature Conservation Interest are all directly affected. It is also notable that serious concerns about this site have been raised by important bodies, including Highways England, Thames Water, NATS and the Environment Agency. Air quality concerns do not appear to have been considered in sufficient detail, or at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4881  Respondent: 8859553 / Clare Bevan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
8. The continued inclusion in the Local Plan of the former Wisley airfield (which is located in Ockham and which is known locally as Three Farms Meadows) is perverse and illogical, and is unsound for reasons of sustainability, deliverability and need.

Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), I OBJECT to the inclusion of that site in the Local Plan on the grounds that:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.

2. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of a new settlement of over 2000 dwellings at FWA/TFM was after 14 months decisively and unanimously rejected by GBC on 8 April 2016 following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

1. was an inappropriate development within the Green Belt;
2. would have a clear and substantial detrimental impact on the openess of the Green Belt and conflict with the purposes of including land within the Green Belt;
3. failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;
4. failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
5. was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
6. would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;
7. failed to deliver the required transport sustainability measures;
8. failed to secure an appropriate provision of affordable housing;
9. was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
10. would result in loss of the safeguarded waste site;
11. presented a dense and urban form of development owing to its quantum and scale;
12. had an adverse impact on the setting and significance of a designated heritage asset;
13. had an unacceptable air quality impact;
14. impacted on education infrastructure;
15. impacted on policing infrastructure;
16. impacted on health infrastructure;
17. impacted on library provision.

3. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt. There are no exceptional or very special circumstances justifying removal of the site from the Green Belt or its development.

1. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath Special Protection Area, a SNCI and a SSI.

2. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the dangers and possible illegality of increasing pollution and decreasing air quality as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding area.

3. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.
1. The total unacceptability and disproportionality of the threat posed to Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, Conservation Areas and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased over 15 times.

1. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of Ockham’s population, as evidenced in the existing Ockham Parish Plan and the emerging Lovelace Neighbourhood Plan.

1. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road safety, with increased vehicle movements (an estimated 4000 additional cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity, and on local services and infrastructure.

1. The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which 45.4ha is classified as best and most versatile land – Grade 2 and Grade 3a).

1. The fallacious nature of claims made that FWA/TFM should be regarded as “brownfield” or previously developed. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA.

1. Much evidence exists that the adverse consequences of development of the site, including damage to the ecology of, e.g., the SPA, cannot be mitigated.

1. The impossibility in practical terms of creating a sustainable development on FWA/TFM which is further demonstrated by the historical use of and lack of development on the site, and most recently by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development plan despite numerous attempts over an extended period.

1. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and the Horsleys, and the impact on the future development plans of the RHS at Wisley.

The above objections graphically demonstrate why FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make the site totally unsuitable for any kind of significant development.

The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and decisions, and amounts to disregard for widespread local and further afield opinion.

I therefore strongly OBJECT to this further and unwarranted attempt to exclude FWA/TFM and other parts of Ockham Parish from the Green Belt and thereby to encourage development thereon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed local plan on Wisley Airport on the following grounds:

**Green Belt** – Reduction of Green Belt in the Borough Local Plan would be extremely detrimental to the villages. Any loss to this important land, would create a dangerous precedent.

**Lack of Facilities** - The village does not have sufficient facilities to support more development.

- The medical centre will be required.
- A separate school will be necessary.
- Statutory Undertakers – I do not believe that there is sufficient capacity to cater for the additional developments. Before any sites are considered for approval it is essential that a feasibility study is carried out to determine whether the sewage, drainage, electricity and gas networks can accommodate any further development.
- Highway Safety – The roads in East and West Horsley are relatively narrow and the visibility is often poor, therefore any substantial increase in traffic would lead to more accidents. I am involved with the speedwatch in West Horsley and the speed of traffic often travels at speeds higher than the limit. It is submitted that vehicles entering and leaving an access have to accelerate, slow down or stop in the road whilst other traffic passes them. Such manoeuvres give rise to misjudgement of speed, distance and clearance, which is one of the main causes of accidents. Accesses are potentially dangerous and their numbers should be restricted in the interests of safety and traffic flows. I recommend that a full traffic and capacity study should be carried out prior to any development being approved. Any necessary highway improvements should also be submitted for comment.
- The road structure has not been constructed to a sufficient standard for the existing traffic.
- Pavements East Lane, Ockham Road South and North are narrow and as a consequence a hazard for pedestrians, especially women with prams and toddlers. The additional traffic would make matters worse.
- There is not any provision on the roads in Horsley for cyclists. I was witness to a fatal cycling accident outside my house.
- There is not sufficient parking at the railway station at present so any increase of population would exacerbate the situation. I also understand that the trains at peak hours are very crowded with standing room only.
- There is often insufficient parking in the village centre.
- A large number of houses would completely change the character of the village.

The above comments are primarily concerned with East and West Horsley. The major development proposed at Wisley Airport would further exacerbate these issues.

On the above grounds it is submitted that the proposals for the Draft Local Plan be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</table>
I object to the proposed local plan on Wisley Airport on the following grounds:

**Green Belt** – Reduction of Green Belt in the Borough Local Plan would be extremely detrimental to the villages. Any loss to this important land, would create a dangerous precedence.

**Lack of Facilities** - The village does not have sufficient facilities to support more development.

- The medical centre will be required
- A separate school will be necessary.
- Statutory Undertakers – I do not believe that there is sufficient capacity to cater for the additional developments. Before any sites are considered for approval it is essential that a feasibility study is carried out to determine whether the sewage, drainage, electricity and gas networks can accommodate any further development.
- The A3 is at present running above capacity and there at present extensive queues at junction 10 and the section to and fro from Guildford, therefore a major development adjacent to the A3 cannot be accomodated.
- Highway Safety – The roads in East and West Horsley are relatively narrow and the visibility is often poor, therefore any substantial increase in traffic would lead to more accidents. It is submitted that vehicles entering and leaving an access have to accelerate, slow down or stop in the road whilst other traffic passes them. Such manoeuvres give rise to misjudgement of speed, distance and clearance, which is one of the main causes of accidents. Accesses are potentially dangerous and their numbers should be restricted in the interests of safety and traffic flows. I recommend that a full traffic and capacity study should be carried out prior to any development being approved. Any necessary highway improvements should also be submitted for comment.
- The road structure has not been constructed to a sufficient standard for even the existing traffic.
- Pavements East Lane, Ockham Road South and North are narrow and as a consequence a hazard for pedestrians, especially women with prams and toddlers. The additional traffic would make matters worse.
- There is not any provision on the roads in Horsley for cyclists. I was witness to a fatal cycling accident outside my house.
- There is not sufficient parking at the railway station at present so any increase of population would exacerbate the situation. I also understand that the trains at peak hours are very crowded with standing room only.
- There is often insufficient parking in the village centre.
- A large number of houses at Wisley would be detrimental to the Horsleys and completely change the character of the village and the surrounding area.

The above comments are primarily concerned with the A3 and East and West Horsley. The major development proposed at Wisley Airport would further exacerbate these issues.

On the above grounds it is submitted that the proposals for the Draft Local Plan be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT also to the proposed development of the Wisley airfield site. This is a totally inappropriate development within the Metropolitan Green Belt area which should be protected. The need for 2000 dwellings has not been justified and will place untenable strain on local services which has been well documented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3857</th>
<th>Respondent: 8861537 / Phil Stubbs</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5942  Respondent: 8861921 / Jane E Lines  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposed development of 2,000 houses in Ockham would have an enormous impact on the Horsleys

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4951  Respondent: 8862465 / Nik Church  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2588  Respondent: 8864193 / Vincent Finnamore  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for a number of reasons including:

1. This is the least sustainable site identified in both the current and previous versions of the Local Plan because of the site constraints and location.
2. This site is further from railway stations than any other identified strategic site.
3. The site is adjacent to the most congested stretch of strategic road network (SRN) in the county and close to one the most congested junction in the country (M25 -J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (in peak times and also due to accidents, diversions, roadworks etc)
5. Suggested public transport initiatives including bus services to and from Guildford will exacerbate the already over crowded road network leading to unreliability and delay, which in turn will make local residents choose individual modes of transport resulting in further congestion.
6. Public transport bus services to Horsley will reduce the safety of the local road network as lanes are narrow and this will increase danger to cyclists and walkers which should be encouraged as eco friendly alternatives. The area is greatly used by cyclists at all times throughout the year who seek to follow the 2012 Olympic cycle route and train for the annual Ride London –Surrey 100 cycle event. The current plan will add to traffic flows and endanger cyclists and walkers lives.
7. The proposed site is adjacent to the Royal Horticultural Society gardens, which one of the most visited destinations in the south-east of the country. I understand that expansion plans the RHS have will significantly increase the number of visitors to Wisley. From reading the plan, the resultant traffic increase from the RHS has not been considered. Furthermore, there are regular events at the RHS which attract 1,000’s of additional visitors and again the impact of this increase in traffic does not appear to have been taken into consideration.
8. Once completed, there will be minimal employment opportunities on the developed site as a result of which, the majority of new residents will travel to work. The majority of these are likely to use motor cars ( probably with only a driver) and this will add significant volumes of traffic to the already over crowded local narrow lanes.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

As a further over arching comment on local and government policy, I do not understand why more emphasis is not being given to long term investment in developing other parts of the UK. It is evident that the South East and the London conurbation in particular is over crowded. The answer is not to destroy the green belt but to encourage a shift in population to other areas which have been neglected by successive governments.

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 A35 and Policy S2

I object to the Former Wisley airfield being included in Policy S2 as a strategic development site.

I also object to Policy A35 which sets out details of the proposal to develop the former Wisley airfield.

The main reasons for our objection on these policies are as follows:

- Inappropriate development in the Green Belt, and no exceptional circumstances being evidenced for the removal of the land from the Green Belt.
- The site does not exhibit the necessary sustainability, as shown by adverse sustainability appraisal reports.
- Air quality at the site is in excess of EU permitted levels.

The increased volume of road traffic on roads which are already severely congested, and which are regularly and frequently used by leisure cyclists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6666  Respondent: 8875265 / Wendy and Peter Donaldson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The fact that the 2000 home development on Wisley Airfield remains on the Local Plan with extreme implications for West Horsley, the surrounding area, the A3 and the M25 is of great concern.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/461  Respondent: 8875425 / Jill Berliand  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is brownfield land in the urban areas which could be regenerated, without the need to encroach on protected Green Belt land. **We have seen no plans for the use of brownfield sites.**

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than **double the figure used in previous plans.**

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• **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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:**
  1. The assertion that the development will result in a meaningful shift to cycling and walking. **The development is too isolated, the roads are narrow and unsuitable for walking and cycling and the development itself is too spread out, the demographic constitution of proposed homeowners is likely to contain disabled, young children and older residents – all of whom will need private cars and therefore it is impossible to anticipate a reduced reliance on private cars**
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6091  **Respondent:** 8875937 / Judith Moore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 Former Wisley Airfield (FWA/TFM) from the green belt as no exceptional circumstances have been established to remove the land from the Metropolitan Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6093  **Respondent:** 8875937 / Judith Moore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also wish to object to the continued inclusion of FWA site on this Local Plan....as the plan was unanimously rejected by GBC planning on April 8th 2016, when a broad number of authoritative agencies such as Highways England, Thames Water, the Environment Agency, and NATS all shared the views expressed above. The environmental essentials will be threatened, SPA, SSSI, SNCI, by any further development in this area.

8 I also wish to object to the major new development, as I am concerned about our ability to provide Health Care to any major increase in the population to this area. The local hospitals are working at capacity already, and the A&E departments at over capacity for much of the time to accommodate an ageing population and increased demand. There are no future plans to address a massive expansion in the current numbers of people living in this catchment area, mentioned in the Guildford plan, on our hospitals. I wish these concerns to be represented for the local population.

I trust these objections will be fully considered and that the Former Wisley Airfield, Allocation A35 will be removed permanently from the Local Plan immediately.

I support Wag in all their views to support this vital issue for the future of this area, and for the future quality of Guildford life for the generations to come.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: pslp172/2792  Respondent: 8875937 / Judith Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object in principle to the local plan, and in particular to the inclusion A35 Three Farms Meadow in the Local Draft Plan. The Council has failed to remove the site, and disregarded thousands of objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4007  Respondent: 8876257 / Peter S Cliff  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

ALLOCATION OF LAND AT FORMER WISLEY AIRFIELD FOR HOUSING-LED DEVELOPMENT

*This proposed development would represent a departure from the National Planning Framework. Para 83 states that Green Belt boundaries should only be altered in "exceptional circumstances". The proposed development cannot be deemed as such.

*The site cannot be deemed as sustainable, with poor access to rail and lengthy bus connections. Potential residents would have to travel great distances to commute to work.

*Additional vehicle movements would further degrade air quality in the area.

*Although the actual figure has not yet been established, the council leader admitted on 13” April that the Objectively Assessed Needs figure was exceeded in this Draft Borough Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1456  Respondent: 8876257 / Peter S Cliff  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site A35 Former Wisley Airfield:-

The increase to 95.9 hectares represents an inordinate increase in traffic movements (congestion, pollution).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objectives to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2283  **Respondent:** 8876513 / Tony Forrest  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I feel strongly, along with my family that this proposal to desecrate our local greenbelt land for a massive development to which there is no proven need is abhorrent to us.

The proposed site falls in the sight line of the Surrey Hill Area of Outstanding Natural Beauty and the rural landscape is probably the main reason that we chose to live in this beautiful hamlet. I really thought when we moved into Ockham nearly thirteen years ago that our concern would be disappointment if local neighbours were given permission to build properties out of line with the area and ruin the landscape for future generations. I never contemplated that we would be contesting a whole additional enormous development close to us on green belt land.

I object primarily that this site should be included in the plan at all, as far I can see, no exceptional circumstances have been established to warrant removing it from the Metropolitan Green Belt. It is only very recently that Guildford Borough Council unanimously refused a planning application for this area.

My understanding of a Local Plan was to enhance the quality of life of our Borough's resident population not to actively encourage urban sprawl. I have to have hope and faith that the many bodies involved in providing the detail behind our concerns will be able to convince that you that the above area of inclusion is impracticable but totally unjustified.
I look forward with great interest to hopefully learn soon that this site will remain out of the Plan and 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:** PSLPS16/2369  **Respondent:** 8877121 / Tim Sindall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I wish to lodge objections relating to the Guildford Borough Council New Local Plan 2016 concerning land at former Wisley Airfield, Ockham in respect of:

- the proposed development represents a fundamental breach of Metropolitan Green Belt rules;
- the site does not meet acceptable levels of sustainability;
- the site will have a severe impact on local traffic and infrastructure;
- there are damaging health and safety implications arising from development of this site;
- the environmental impact on protected wildlife will be substantial; and,
- the proposed development is totally out of keeping with local character, context and distinctiveness.

My rationale for the objections listed above is articulated in the letter sent by East Horsley Parish Council Local Plan submission on Policy A35 dated 4 July 2016 to which I respectfully direct your attention. Their letter contains additional observations that address other particulars contained in the proposed Policy A35 and these, too, I endorse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3150  **Respondent:** 8879553 / Sheila Lauchlan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am not a resident of Guildford, but being a Cobham resident, I am more interested on what goes on, on the doorstep, than those Guildford residents living further away.

- I would like to object to the proposal to remove the former Wisley Airfield from the Green Belt. This area provides amenities for local people and prevents the urban sprawl from London. A development would create a corridor stretching from London to Guildford.
- There are no reasonable arguments for removing this site from the Green Belt.
- Guildford has ample brown field sites.
• The surrounding area is composed of very small villages and narrow roads, and the proposed development would change the nature and character of these communities. It would overwhelm them.

• The villages in the area are historic rural settlements, and the proposed draft plan would have an adverse effect on them.

• Ockham is a hamlet of 159 houses. The proposed development would subsume this village, with 2000 houses and other buildings, some being 5 storeys high. This would provide a density greater than some London Boroughs.

• Hatchford would be greatly affected by this development.

• The impact on the local area, where the roads are already congested, would be unbearable, and I would like to object to projected number of cars i.e. 4000 plus extra traffic servicing the area. The roads are little more than farm tracks and will not cope.

• The increased traffic would be dangerous on the narrow local roads. Cobham is the nearest the nearest shopping centre, and parking and traffic are already problematic.

• As there are no cycle paths or footpath, the roads are totally unsuitable for walking and cycling.

• There would be an increased congestion, on the already congested A3 and M25, especially at the junctions. The proposed secondary school and the proposed application currently submitted by Wisley RHS would significantly increase traffic numbers, adding to an already congested area.

• There is inadequate public transport and the local railway stations would not cope with additional cars needing to be parked and the trains are already used to capacity at rush hours.

• Air pollution is already in the area already exceeds EU permitted limits, due to the major roads in the area, and I would like to object to any increase in the level of pollution, caused by increased traffic numbers.

• I would also like to object to the fact that there has been insufficient consideration given to the damage that such a development would cause to the ecological and environmental aspects of this special site, (Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNI))

• The area is a haven for wildlife, some of which is already endangered. The introduction to this number of residents, along with there pets would have a devastating effect on the wildlife. Protected species on and near the site and wildlife corridors would be destroyed. I would particularly like to object to this issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2119  Respondent: 8879841 / Jonathan and Theresa Hulford-Funnel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The changes in the Guildford Local Plan 2017 are minimal, four of the original housing sites remain, plus sheltered/care homes, employment/retail space and two schools on the former Wisley Airfield.

1. The developments will put further pressure on the already overburdened infrastructure of both East and West Horsley.

2. The road through East Horsley (Ockham Road North & South) is inadequate and there is no scope for expansion. Normal cars have to slow down just to pass each other in certain parts, and climb onto the pavement when a truck passes through.

The development plans for 2,000+ new dwellings plus considerable related infrastructure on the Wisley Airfield, is only two miles from East Horsley, and will add considerable traffic to the area.

1. We do not have sufficient facilities, schools, surgeries and other services to cope with the increased population. Gas, electricity and telephone services in the area are already operating at full capacity on very old
pipes, wires and exchanges. Local roads are too narrow and winding to take the existing traffic, and there is insufficient parking anywhere, even in front of most homes. The local roads were built in the 1930s or before, and are mostly no more than narrow lanes where cars have to slow down to pass each other. The access roads to East Horsley are narrow and winding and are not sufficient to handle even today’s traffic.

2. The scale of the proposed Wisley Airfield development is way out of proportion and way out of character to the existing infrastructure and the space available in this small, picturesque old village. The new town will completely destroy the special character of our historic village.

3. The Green Belt is a policy for controlling urban growth. The idea was developed so as to have a ring of countryside where urbanisation would be resisted, maintaining an area where agriculture, forestry and outdoor leisure could be expected to prevail. The fundamental aim of a Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness.

The 2012 National Planning Policy Framework (NPPF) issued by the Government clearly sets out the following purposes (amongst others) for including land with the Green Belt:

- To check the unrestricted sprawl of large built-up areas
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

How do you reconcile the Wisley Airfield proposal, and the removal of the Horsleys from the Green Belt, with the NPPF’s guidelines above?

I do hope that this time, GBC will listen to the very strong objections to the local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
streetlights, very few pavements and many listed houses to be overwhelmed by a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the hugely detrimental impact this development would have on local roads and road safety through the massive increase in the volume of road traffic it would create. Walking or cycling safely on local lanes is difficult already and local public transport is inadequate even for the needs of the present population.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of acid deposits on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I hope that these objections will be fully considered

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/4354  **Respondent:** 8880225 / Jennifer Rankin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **Legally Compliant?** ( )

When Wisley Airfield was created there was a condition that when its use as an airfield ceased the land would return to farm land and building a new town there is not in sympathy with that promise.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/1850  **Respondent:** 8880353 / Judith Allen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **Legally Compliant?** ( )

I object to the continued inclusion. Of a site (the former Wisley Airfield, - now known a as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's(WPIL) planning application was unanimously rejected by GBC on 8th April, 2016 of the recommendation f GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/3227  **Respondent:** 8880353 / Judith Allen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

I am writing to object to the inclusion of the policy A35 in the Draft Local Plan on two grounds, the physical constraints of the site and the fact that it is the least sustainable site.

It is not near any railway line, is close to the heavily congested site J 10 of the M25, adjacent to the polluted and already, at times gridlocked A3.

The narrow surrounding lanes are unsuitable for an increase in the flow of traffic and the proximity to cyclists.

It is near Wisley RHS where there are increasing visitor numbers, events and consequently increased traffic.

There is no local employment thereby increasing the need to commute.

I object to the increase in site boundaries, not on the original plan (AppendixH p16) which will now have an adverse impact on the Listed Upton Farm.

Ockham DVOR/DME is not due for removal for approximately 5 years and building restrictions in the vicinity are in force.

I object to the visual impact that this applications will have on the protected landscape of the AONB.

I object to the unjustifiable removal of the Green Belt status and the impact on the archeology of the site.

I object to the fact that the Borough Council has not used any constraints such as the Green Belt, air quality, infrastructure and AONB considerations.

The Council has submitted inaccurate housing numbers.

For these reasons, I consider that this Plan is neither sound nor fit for purpose.

I require confirmation that this and all of my other comments are passed to the Inspector. I also reserve my right to attend any planning hearing meetings.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6860  **Respondent:** 8880865 / Jane Paton  **Agent:**
5. Policy A35 - land at the former Wisley airfield

This site cannot sustain a new town. Building a new town is contrary to the stipulations in the NPPF that Heritage and Environment must be protected and enhanced. Building a SANG immediately beside a Special Protection Area is guaranteed to attract more visitors to the SPA - the very opposite of the purpose of a SANG. Building a new town in the heart of the parish of Ockham will destroy its heritage. The promotion of this site has involved serious misrepresentations of the facts. For example it is stated that the site is brownfield- when at most less than 25% of the site could be considered previously developed and of that area 60% is already allocated for a waste disposal site. The garden hedge of Yarne is not a defensible permanent Green Belt boundary

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. This land is not brownfield. As I understand it the last time it was used as an airfield was over 50 years ago and the arrangement was that it would revert to agricultural use thereafter. The landing strip remains but there has been no commercial activity on the land at any time other than the emergency use as an air strip during WW2.

3. The site is very poorly served with transport. There are no reasonable means of access to any stations within the vicinity and certainly practically every journey to and from this proposed development would have to be by car. I thought the planning departments and central government were looking for sustainable development solutions? This site is served by narrow country lanes none of which even has a pavement, with the exception of the A3 which pedestrians should not use.

4. All the local South West Trains stations in the area, although not nearby, are operating at pretty much capacity in terms of car parking at present.

5. The land is of importance as an agricultural/wildlife site. There must be numerous better located sites on which to develop housing – ideally within reach of transport networks and places to shop and work. This is an isolated spot surely not suitable for the huge number of homes and with them people anticipated.

Whilst I understand that pressure has been put on Guildford planners to find room for additional homes, surely any additional housing developments of any significant size need to sited closer to public transport and at least with access to pavements and lit roads.

For these reasons I object to the proposals and I hope my views will be taken into account when the matter is considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to **object** to the revised new local plan for Wisley Airfield.

I live in Horsley, and you already can't get into the local school, park at the station, get an appointment at the doctors, or park near the shops.

Even the local Football club is full!

The new development at Wisley would be an absolute disaster for the village and the surrounding villages in the area.

I absolutely **object** to the plan for 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:** PSLPS16/2284  **Respondent:** 8882209 / Lisa Forrest  **Agent:** 8882209 / Lisa Forrest

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the draft Local Plan for the following reasons:

FWA/TWM latest planning application has only recently been *unanimously* rejected by Guildford Borough Council but it still remains in this plan as a significant strategic site. How can this be?

I am writing again as a homeowner in Ockham who bought our property here because of a desire to be in the heart of the countryside in a quiet hamlet I cannot believe that there has suddenly become a need for over 2,000 houses which need to be built here. Apart from a lack of evidence that all the brownfield site have been fully explored and all regeneration options fully considered, there is just not the place for such a vast scale development. It is Green Belt land and 70% of new housing is proposed to be built on it! I still have yet to see the exceptional circumstances which warrant it this area being removed from the Metropolitan Green Belt.

Above objections aside, apart from the FWA with other very large sites under consideration there is potential for us and the Horsley’s to be battling the narrow roads with potentially thousands and thousands more cars. Even if adjustments can be made to the A3/M25 the inevitable local traffic chaos here would be intolerable.

Our historic village of not many more than 150 households to be made to be swallowed up into a 2,000+ dwelling development is completely abhorrent on every level.

The frustrations that we have an already existing Flood Plain issue, the fact that are railway stations are already at full capacity and that most of our local roads are by nature single lane or very narrow makes this proposal seem ludicrous.

We can but hope that we as residents have been consulted because our views matter but if not, please do heed the serious concerns raised by the Highways England, Thames Water etc.

I obviously await reassurance that this area will be removed from the plan.
Furthermore, there is the option of using the Ockham Airfield as a last resort for some limited development should the brownfield sites aforementioned not be sufficient for the number of properties finally agreed. It should also be added that any such development that is finally agreed and located on such brownfield sites, should reflect a good percentage of affordable housing, enabling first time buyers to remain in their locality.

Much of Surrey and Guildford in particular is now far too expensive for first time buyers, and a distortion in a true demographic mix of the population is becoming more evident. This must be taken into consideration with any such development in the brownfield opportunities our local area can offer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3040  Respondent: 8883105 / P J Warner  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I note that the possibility of a new town on the Wisley site is still mooted. After the annihilation of the last application by the Guildford Council surely the arguments used against the proposal are still valid. One would have thought this ruled out any consideration of development on this site. Illogical in the extreme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1524  Respondent: 8883489 / N & B Hinchliff  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
6. The development of the former Wisley Airfield.

The inordinate number of houses planned for this area would have a massive negative and unsustainable impact on the Horsley villages. The nature of the mix of houses, retail, commercial, traveller and schools development just under 2 miles away could not fail to have many problematic consequences for the Horsleys. The extensive developments at Burnt Common and Gosden Hill Farm, Burpham are also problematic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6273  Respondent: 8884929 / Susan Bamber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Building 533 homes in East and West Horsley and 2000 on Wisley Airfield amounts to 2533 new homes. This is a huge increase for the area. How can people who have chosen to live in a semi-rural location be forced to have the area changed so fundamentally? Building a town that includes 2000 houses on Wisley Airfield would certainly not be a development on a scale that is compatible with its setting. Surely this is valuable agricultural land and should be used as such. All this land was meant to be returned to agriculture after the 2nd World War, but somehow that never happened. The roads in this area were not designed to take the large amounts of traffic they already have to cope with. Traffic on Surrey’s roads is already much higher than the national average.

I live where Old Lane joins Forest Road. We already struggle with the large amount of traffic that races down Old Lane to reach the A3 and M25. Many cars are now parked on this end of Old Lane (because not enough parking was allocated to the homes built on the site of the Lord Howard public house). They block my view when I am trying to pull out of my drive and, given the speed and volume of the traffic, there is an accident waiting to happen. If 2000 houses are built on Wisley Airfield the traffic will be overwhelming. People who live in the new town will use Old Lane to reach Cobham and the surrounding area. The roads are already full to capacity with traffic. For example trying to join the A3 by Wisley Airfield in the morning rush hour, to then join the M25 at Junction 10. This section of the M25 already crawls along. A new town will make this impossible. Local services such as doctors’ surgeries, local shops and parking already seem unable to cope with the number of people living in the area. If these plans go ahead it would be a very short-sighted tragedy, not just for this area, but for the whole South East of England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/642  Respondent: 8886913 / Rosamund Bovill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. The Wisley development has been turned down by the Guildford councillors on the advice of the planning committee and many comments from local residents on the unsuitability of the site. The site should no longer be in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I have written before to object to the inclusion of Three Farms Meadows in the local Plan and I object to the issue being included in the new plan after it was turned down previously by all councillors.

The local roads are not suitable for more traffic and are not suitable for pedestrians or cyclists travelling to stations.

Local station car parks are already at full capacity.

Wisley gardens have increased their visitor numbers hugely and they are planning a further increase. During their special events the A3 is already blocked at peak times and will inhibit traffic flow in both directions.

Part of the site is in Green belt and there is no case for building to take place here. The proposed buildings will impact on the local villages and areas designated AONB.

Changes to the original plan do not make sufficient change for there to be a new submission. It is a waste of our council tax to pursue a new enquiry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY A35: Land at former Wisley Airfield

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/6710  | Respondent: 8887009 / Jacqueline Weller  | Agent: |
I OBJECT to Policy A35 - which will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6507  Respondent: 8887265 / Harvey Weller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY A35: Land at former Wisley Airfield

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I OBJECT to Policy A35 - which will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1808  Respondent: 8887745 / Jan Wollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley

Whilst I recognise that Wisley airfield is redundant land, the area is prone to flooding, as anyone who has lived here long enough knows. The access to the A3/Wisley roundabout tends to flood during serious rainfall, and the road has been impassable several times during the last sixteen years we have lived here. You cannot responsibly build 2000 plus houses and not provide a school, medical centre, some local shops, post office, community centre and recreational space. This should be a new community where people have their own facilities and not have to travel along narrow lanes to source them. These facilities should be put in place at the same time as the houses are built. I have seen no confirmation anywhere that GBC plan to provide these facilities. On average, each house could be expected to own two cars. At present the station car park in East Horsley is full each day. Where are these people going to park if travelling into London. Similarly, it is often difficult to get an appointment at the Doctors surgery, so they wouldn’t be able to cope with so many extra patients. I understand that commuters are now using the Village Hall car park and therefore when the Medical Centre car park is full, we are also unable to park in the Village Hall car park, and this is before just one extra home is built in the Horsleys.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2205  **Respondent:** 8888289 / Hazel Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Consideration should also be given to the further threat posed to the Horsleys by the proposed huge development at Wisley Airfield, less than two miles away, which in conjunction with the Local Plan proposals will overwhelm these rural villages and the very qualities which have made living in them so attractive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2679  **Respondent:** 8888289 / Hazel Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object most strongly to the re-consideration of the above proposed development.

I object to this site **being on Green Belt land.**

I object to the **huge scale of this settlement of over 2000 houses as well as retail, commerce, traveller and school developments.** This is less than two miles from the rural villages of Ripley and the Horsleys and will have an enormous negative impact on their infrastructure.

I object because:

- **ROADS** are narrow, already congested with cars and heavy vehicles (the railway bridge has already been damaged by a large lorry)
- **ROADS** have no space for cycle lanes for the VERY many cyclists who use our villages regularly. This is a dangerous situation
- **PARKING** at Horsley is at a premium and both Horsley and Effingham Stations are at full capacity
- **SCHOOLS** are over subscribed
- **MEDICAL SERVICES** are stretched

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Finally how does the draft plan “know” that a school can be built on the Wisley site when the Borough planning committee turned the plan down and the appeal is not until September 2017?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The proposed village at Wisley will have an incredibly detrimental effect on East and West Horsley. With all the roads connecting to the A3 near to, and south of, the M25 junction shut off bar the one at Ripley that comes through East Horsley, much of the traffic for Dorking, Leatherhead and Guildford will be directed through our village. This is already a narrow and dangerous road that cannot cope with the traffic using it, including many large lorries. The junction with the A246 will come to a halt, not helped by the the traffic from the proposed 48 new houses at Thatchers and the 22 proposed for the BT site. The residents of the new Wisley village will be encouraged to travel to work by rail, using Horsley station, already under pressure, with no capacity for increased parking. This is a proposal to build a small town, unattractively close to the M25, in an area that harbours wildlife, some of which is increasingly rare, and trees and vegetation that balance the emissions produced by the 24/7 traffic of the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. the ridiculous number of houses proposed at Wisley without attention being paid to already busy and dangerous A3, pressure on schools and medical facilities.

If the development behind Weston Lea goes ahead please incorporate a path from Weston Lea to the centre of the village to avoid residents, especially the elderly having to walk along the narrow and dangerous footpath into the shops at East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1728  Respondent: 8891809 / Sarah O'Neilly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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 plans to build 2000 houses, plus sheltered/care homes, Gypsy/traveller pitches, employment/retail space and two schools on the Former Wisley Airfield and fields.

As I have previously stated, there is insufficient infrastructure in the surrounding villages to support this notion, and furthermore the traffic congestion, which is already heavy during rush hour times, with the introduction of in excess of 5000 cars in the locality will become completely ludicrous. This will have a knock on effect on the M25 orbital, the A3 and of course Guildford. And how will the local train station at Horsley cope with the introduction of more commuters joining trains, not to mention the already over spilling station car park?

I also do not consider that our local police force will be able to cope with the input of so many people, and we will see crime rates rise as a consequence. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Will any consideration actually be given to the emergency services, which are already stretched in the area? I do not see mention of a doctors practice or hospital being included on the airfield development. Where will people be expected to go to visit their GP’s? The current practice at East Horsley is already too busy, and it takes long enough now to get a routine appointment.

Where will all the extra rubbish and recycling go from this site? Will we see our council taxes rise further to fund both refuse collection for all and of course extra schools, doctors and policing in the area?

I strongly suspect that those individuals putting forward these crazy notions, do not actually themselves reside in the villages surrounding Guildford, or they possibly wouldn’t have dreamt up such a selfish and non sustainable whim.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1517  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I **OBJECT** to both the inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham) and the proposal to build 2000 new homes on it. The impact on the nearby villages of West & East Horsley (less than 2 miles distant) and of course Ripley of an additional 5,000 cars (plus associated additional traffic such as couriers, supermarket deliveries, buses etc) would be catastrophic. There is no room to park NOW in either of the Horsley villages or at the local stations in Horsley and Effingham and so a development of this magnitude would be calamitous.

Furthermore, the impact of an additional 5000 cars, all using the Ripley Roundabout for egress and access (not to mention an additional 5000 from the site proposed at Gosden Hill Farm (Policy A25), would simply magnify exponentially the major traffic flow problems that exist NOW. The nearest railway stations to this proposed site are those of Horsley and Effingham Junction; both of which are full to overflowing NOW and have no space available for enlargement. As is already evident NOW, anybody who attempts to drive towards the A3 / M25 from West / East Horsley, Send or Ripley during the rush hour faces a daunting proposition because not only is the A3 slip road (going northwards) at a virtual standstill but so is the A3 to the extent that the A3 traffic coming from the Guildford direction will be backed-up for several miles. Equally, the local village shops of Ripley and East Horsley have major parking problems NOW and would not be able to cope with the additional cars associated with this proposed development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
development” but a predetermined bias in favour of specific applicants, who have already been given many additional months to refine their application prior to its rejection. It is therefore my opinion that this development should be removed from the new Draft Local Plan for all the same reasons that it was rejected by GBC’s Planning Committee on 6th April 2016. These include:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
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I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. Development on the site will create an urban corridor stretching from London to Guildford.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site.

I object to the detrimental impact on transport, local roads and road safety.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels.

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3296  Respondent: 8892449 / Marco Attard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strong once again to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan.

I highlight below some of the objections as to why I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan:

Grade 2 listed building within 100 metres of your proposed site. I strongly object to the increased area of the site is located 100 metres from Upton Farm which is a Grade 2 listed building, one of the heritage sites in Ockham, and would have a huge impact on our outlook and views all around. Not to mention the noise pollution, environmental impact, and loss to our quality of life. We have spent years adhering to the stringent Heritage Rules to make sure this house is in keeping with its period and history.

I strongly object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

Local roads are at full capacity and often grid-locked in the rush hours, particularly when the weather is bad, when going to work

It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10)

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”!
I object to para 21 which “limits” development in flood zone 2 and 3. Development should be EXCLUDED in flood zone 2 and 3.

I strongly object to the fact that the council has failed to remove this site from the local plan, despite receiving 1000’s of objections from local residents and statutory consultants.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLP16/7657  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**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 A35 Wisley

1.2 **We object** to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

1.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

1.5 Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”. 2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).

4. Proximity to A3/M25 bottleneck and Ripley village and roundabouts. 5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on 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: PSLPS16/1446  Respondent: 8896961 / Marianne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
3. 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.
4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisley Airfield Site

I strongly object to this proposal remaining in the new Local Plan. Ockham has been designated with "limited infilling" so I fail to understand how the Wisley plan can possibly remain in the Plan, especially as it was rejected by the Planners just a few months ago. This cannot and must not happen. The area is an important site for wildlife and much needed green space and acts as a buffer for Ockham Village from the pollution and noise from the A3 and M25. In addition the local roads simply cannot cope now with the volume of traffic and adding to it by such a huge number of vehicles every day would be disastrous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

SITE A35 FORMER WISLEY AIRFIELD

The increase in size to 95.9 hectares. The volume of traffic whilst building and once families move in will cause additional congestion and pollution to our already overcrowded local roads. May I remind you that already levels of nitrous oxide are above safe amounts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With regard to the proposed development of the former Wisley Airfield as I have stated before this appears to be being treated by Guildford Borough Council as though it was the development of a brownfield site. It is not. The clue is in the name, Airfield. It is or at least should be a field in the Green Belt if the agreement with the original owners to remove the runway when it closed had been enforced as it properly should have been. This is therefore just a proposal to build on a large area of the Green Belt with no exceptional circumstances involved and should be rejected on that basis. Notwithstanding that it is a completely inappropriate development of the land concerned both as to scale and nature and would put completely unacceptable pressure on local facilities e.g. roads, sewage, water etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
and will thus irrevocably change its whole character. It computes to some 25 homes per acre when deductions for roads/paths and amenity areas are made. This used to be called “ghetto” density.

- be limited in size by the availability of all necessary local facilities, infrastructure and transport. The Draft Plan contains insufficient and inadequate proposals to increase the schooling, roads and transport, medical facilities, parking, drainage, mains utilities or any other infrastructure required to avoid serious over-use and overcrowding which will be caused by the increase in dwellings and residents near Ripley, Effingham, Ockham, the Clandons and the Horsleys. It will completely change the character of the villages, and attract yet more traffic, already increasing by “rat-running” avoiding the M25 between Wisley & Leatherhead. Parking spaces at existing local shops, the medical centres, Village Halls and particularly railway stations are already at a premium with no room for expansion. The numbers of houses proposed would require the construction of multi-storey car parks at the two local railway stations, more parking at the local shops (how?), and a completely new road layout at various local road junctions, particularly at the A3 (two) and at B2039/A246 junction in East Horsley, which already suffers serious delays in the rush hours. It would also be necessary to widen the roads, in particular A3, M25, and Ockham Road North and South where blockages occur already. The junction designed for the composting facility is totally inadequate for such a housing conurbation. Has this planning (opposed by GBC) not fallen out of time? To suggest that cycling will in any way reduce this impact is nonsense. People will not cycle back from the medical centre with a temperature of 105, nor with four shopping bags, and the vast majority will not cycle 4 miles every morning and evening to and from the station.

- provide primarily, sufficient housing for the needs of the local community e.g. for some children of existing residents who need to purchase locally, or existing elderly residents wishing to downsize, thus providing larger properties for other incoming families. The Draft Plan makes dubious and unsupportable assumptions about housing need in this particular area, and in particular for affordable housing in this location far from existing jobs. The numbers proposed are much too high, and include double accounting. The EU Referendum result will also reduce numbers. “Sustainable development” means that the country needs to spread the burden, and the benefits, of increasing population across a much wider area of the country, instead of attracting yet higher density into the south-east and London. Businesses will, through market forces, move towards available labour, and government should recognise this by providing the necessary infrastructure to other areas anxious to attract better living standards.

- avoid development over our precious greenbelt and spoiling the landscape we desperately need close to major conurbations including London.

- recognise that if any expansion into the Green Belt is proved absolutely necessary, by simple geometry, it would have less impact the farther away it is from the circumference of London which is already under severe threat.

- whilst the Plan suggests that development of housing on Wisley airfield is a low flood risk, this only refers to the new housing itself, being on a slight mound. What it fails to show is the devastating impact this new catchment will have on existing critical local ditches, lakes and drains.

All the run-off from local villages to the south travels northwards, and is already placing a huge strain on the flood plain around the A3 junction/Ripley/Pyrford/Wisley triangle. This area suffers serious flooding already. Any such development would need to provide very substantial pumping all the way to the river and beyond, and/ or water treatment and storage facilities, to avoid impacting local roads, landscapes and amenities.

To summarise, I say NO to:

- Any proposals to remove Surrey villages close to London from the safeguards of green belt status apart from under exceptional circumstances – the Plan does NOT demonstrate this.

- Any development which seriously enlarges existing villages, let alone a new one, except by the careful addition of a few acres, perhaps by very limited “smoothing” of the existing settlement boundaries, so that local people still need walk only a few yards to enjoy the countryside. Such isolated acres do exist for small developments.

- Any overdevelopment which has a density above the level already existing within the local community – Wisley would be 3 to 4 times that.

- Any large new development over green belt land near the borders of greater London, such as proposed here in Horsley (A36-41) and at Wisley (A35), whether some new infrastructure is provided or not, and which will still have a devastating impact on the way of life in existing neighbourhoods.
• Any development which strains the existing fragile infrastructure of local and much-prized villages and communities
• Any impingement of the Green Belt which will open the door to greater and greater development between Surbiton and Guildford, just as has happened between Hounslow/ Staines and Woking, where very little Green belt remains.

I suggest the Borough reduces their estimates for sustainable development, identifies more sensible and sustainable sites for limited expansion, and drops all proposals for any dense or significant developments over, or transfer out of, existing valued green belt land close to London.

If they do not, existing elected representatives who support this Plan, in central government, the county, the borough or the parish will not receive my vote in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Objection to Guildford Borough Council Proposed Submission Local Plan

I OBJECT to the Proposed Submission Local Plan for many reasons, particularly the following:

1. I object to the proposal to allocate so much new housing to the Green Belt; it should be put on the brownfield land in the urban areas of the Borough. That would reflect election promises to preserve the Green Belt.
2. I object to the housing number of 693 houses per year; this number appears to me to be far too high, particularly in the context of Brexit.
3. I object to the proposal to remove the Former Wisley Airfield from the Green Belt. There are no exceptional circumstances to warrant removing the land from the Green Belt. This area clearly fulfils an important objective of separating Ripley, Cobham, Woking and Horsley.
4. I object that this urban 2,000 house development would be totally out of place in the rural village of 159 homes in Ockham.
5. I object to the danger from its effects on transport, local roads and road traffic. The proposed development would result in around 4,000 additional cars on the roads. This will increase the danger from traffic to horse riders on the narrow local roads in Ockham and the surrounding area and increase the already severe congestion on the A3 and M25. Cycling would be dangerous.
6. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area, and the Sites of Special Scientific Interest and Special Nature Conservation. Endangered ground nesting birds such as the Skylark and the Nightjar will be threatened by the development.
7. I object to the threatened loss of high quality farmland where crops have been grown for decades and probably for centuries.
8. I object to the continued inclusion of this site where a recent planning application has already been unanimously rejected by the Planning Committee.

I request that the Former Wisley Airfield, site A35, is removed from the Submission Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4108  Respondent: 8898017 / Jane Lethbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.
8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
9. Opportunity (3) should be common to all sites and is not unique to this site.
10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
12. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
13. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
14. It is further from railway stations than any other identified strategic site.
15. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
16. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
17. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
18. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
19. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

20. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design.”

21. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.

22. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

23. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

24. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

25. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

26. I object to the Council wasting taxpayers and residents’ time and money not following due process and indeed ignoring previous representations.

27. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

28. I object to the Housing number which is unsound and open to legal challenge.

29. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3773  Respondent: 8898081 / Sarah Bowe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• 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.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A few months ago I took the trouble to watch the whole of the podcast of the Wisley Airfield/Three Farms Meadows planning meeting and I wish to object in the strongest possible terms to the waste of public money and time in raising the whole matter of this totally impracticable proposal again.

The objections raised at that meeting by those who had clearly 'done their homework' were precise, detailed and in my opinion, utterly devastating. They made their mark every time and left the other side without a leg to stand on. I could hardly believe it when I heard that the proposal was to be raised again in a revised plan. The developers are persistent, which is hardly surprising, but the fact that Guildford Borough Council should be entertaining the thought of revisiting any revision of such a preposterous proposal raises in my mind a matter of professional competence.

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>PSLPS16/941</th>
<th>Respondent:</th>
<th>8898401 / Mary-Claire Travers</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. Recent data confirms that ONS growth figures should have been used and these have been ignored.

3) I object to the disproportionate allocation of housing in the north of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4) 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.

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) 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.

9) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Limited’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

I also hope that the borough’s housing needs are considered in relation to the effect the Brexit vote will have on population growth ie the consensus is that immigration rates will decrease and therefore the demand for housing will also decrease.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In relation to the specific allocation of site A35, I have a number of objections as outlined below:

1. I object to the inclusion of site A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of infrastructure and in particularly the sewerage constraint due to lack of any spare capacity at Ripley sewerage works.

2. I object to the fact that the Council appear to have directed that the transport assessment for site A35 uses prescribed vehicle movements from site with no justification. I believe this makes the transport evidence subject to challenge due to bias on behalf of the Council.

3. I object to the inclusion of site A35 as it is the least sustainable site identified in both this version and previous versions of the plan because of the constraints of the site and the physical location which is adjacent to the TBHSPA.

4. I object to this site due to the fact that it is further from the railway stations than any other strategic site and that the nearest stations have unsolvable capacity and parking issues.

5. I object to the inclusion of site A35 in spite of unanimous rejection of planning application 15/P/00012 on 14 grounds.

6. I object to the inclusion of site due to the fact that it is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10). The SRN in this location is currently operating significantly over-capacity and the proposed improvements both uncertain in design and timescale. Even with Highways improvements proposed without the impact of this development it is accepted that the A3 is at full capacity and so cannot take the additional traffic from this proposed development.

7. I object to the inclusion of site A35 due to the fact that the local road network is also at capacity and is severely adversely affected when the SRN is not free-flowing at times of accidents, diversion, roadworks etc.

8. I object to the allegation that public transport provision will be able to mitigate the impact of this allocation especially as bus routes to/from Guildford will have to utilise the over-crowded SRN in one/both directions and therefore will be unreliable and subject to frequent delays.

9. I object to the inclusion of site A35 due to the fact that any public transport (bus services) provision to Horsley and/or Effingham junction will impact the safety of the local road network as the lanes are not legally wide enough to accommodate PSVs, particularly when sustainable methods of travel such as cycling and walking are being promoted on the same lanes at the same time. This is not only unrealistic but it is also unsafe.

10. I object to the allocation of site A35 due to the fact that the mitigation to address the impact of increased traffic will not address the commuters travelling to Woking station.

11. I object that due to the fact that site A35 is adjacent to the most popular tourist attraction in the south-east, the RHS at Wisley where the visitor numbers are due to increase by 500,000 visitors per annum and that the associated traffic increase has not been properly modelled or taken into account; and

12. I object to the fact that nor has any account been taken of the traffic resulting from the regular events at the RHS which attract 1000’s more visitors several times a year in the consideration of the allocation of site A35.

13. I object to the fact that the inclusion of site A35 has not properly taken into account the impact of the changed boundaries of the allocation on the adjoining heritage assets and in general and in particular the impact on the setting of Bridge End House (Grade II) and Upton Farm (Grade II) in addition to the known impact on Yarne.

14. I object to the dismissal of the substantial or less than substantial negative impact on the setting of the Grade 2 listed property Yarne. The requirement is to go through a process supported by statute and is to be given a ‘heavy weighting’ when considering the balance of harm versus benefits of development. As this is enshrined in statute law it is not legal to ignore these effects on Yarne and surrounding historic sites.

15. I object to the fact that the increased allocation at site A35, being on the south of the site facing the Surrey Hill AONB will further negatively impact the views to and from the AONB.

16. I object to the removal of an additional 3.1ha of land from the green belt without any justification.

17. Furthermore, I object to change of the site boundaries of allocation A35 as these are not identified clearly or correctly on the plan (Appendix H p16)

18. I object to the unjustified change in the green belt boundary at the eastern end of the site especially as this now encloses an area of high archaeological interest which will prove difficult to develop in the light of the archaeological finds in the surrounding area.

19. I object to the fact that the impact of the OCK/DVOR has not been properly taken into account in the allocation of site A35. It remains unclear when/if this will be decommissioned as the timetable has already slipped. The constraints on the site due to the DVOR are significant and if it is not decommissioned will severely limit the availability of the site to deliver enough land to make the allocation viable.
20. I object to the fact that insufficient weight has been given to the sustainability of allocation A35 due to the lack of employment available onsite meaning that almost all residents will have to travel to work. As already identified above it is unrealistic and unsafe to assume people will walk/cycle to work on narrow unlit local roads on anything more than a very occasional basis.

21. I note that the changes in the opportunities listed in site allocation A35 reinforce why this site is totally inappropriate, talking of “good urban design” – just what is needed in a rural area.

22. I object because of the impact on the TBH SPA of A35 to the mitigation strategy proposed concerning use and calculation of the SANG and considering the appointment of a warden to solve the issue of inhabitants and cats being drawn down the rights of way and into the sensitive TBH SPA. The mitigation strategy proposed is inadequate.

23. I object to the undercalculation of SANGS and the failure to recognise the flooding of the southern area designated as SANGS thereby meaning there is inadequate SANGS to protect the TBHSPA

24. I object on the same grounds as RSPB to the negative and inadequately mitigated impact on the SSSI,SNCI and TBHSPA

25. I object to the fact that site A35 will not meet any of the 5 year housing requirement and is subject to so many exigencies and infrastructure costs it cannot be an exceptional circumstance to include it in the Plan which thereby removes the site from greenbelt.

For all the reasons I have already identified in previous submissions, together with the reasons listed above it is quite clear that site allocation A35 is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4145  Respondent: 8898401 / Mary-Claire Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the impact of Guildford Borough Council Draft Local Plan on Heritage sites and Conservation Areas in Ockham

Despite its relatively close proximity to London and nearby towns Ockham has escaped suburbanisation. It has retained its distinct rural heritage and has not been subsumed within much larger conurbations. It remains a rural parish and retains its identity as an evolution of a collection of medieval hamlets where small houses nestle together in settlements with their own distinct character. The foundation of the local economy remains agricultural based around arable and livestock farming, equine recreation and game bird rearing.

The special character of the built environment in Ockham is acknowledged by the fact that 29 buildings have been listed by English Heritage. Many of the listed buildings are farm houses by origin. Their setting was and remains rural and agricultural. Upton Farm and Yarne are both 15th century farmhouses immediately adjacent to Three Farms Meadow and have views over it. Appstree and Bridge End have land adjoin Three Farms Meadow. The development of high density housing at Three Farms Meadow will cause irreparable damage to the setting of the listed buildings in Ockham and to the Ockham Conservation Area. The development, because of its location on the highest point of the hill and down the south side of the proposed site will overlook the Conservation Area and impact the setting of those precious and ancient buildings in the Ockham Conservation area causing substantial impact. The effect on the distinctive local Lovelace style would be wholly inappropriate.

The particular significance of the Three Farms Meadows is that it creates a meaningful green gap which enriches and strengthens the separate identities of the different settlements of Ockham. Consequently the separation provided by the
The green gap is a significant asset to both conservation areas and contributes to their character as distinctly separate settlements.

The most significant harm caused by the development proposals is that the scale of development overwhelms the historic settlements of Ockham which are quintessentially small in scale and historic in nature. Unlike many ‘commuter belt’ villages these settlements have escaped extensive redeveloped or extensive post-war expansion. Consequently they retain their evolved medieval form as well as most of their rural separation and setting. These are the characteristics which make them special and gave rise to the designations of Bridge End, Church End and Ockham Mill as a conservation areas.

The disproportionate scale of development in the appeal proposals is contrary to the natural evolution and growth which gave rise to the character of Ockham over the last 500 years. The result will be a revolutionary change in the shape and morphology of the Parish settlements which cannot fail to harm their distinct character.

The historic parish currently consists of 163 dwellings. The addition of another 2,100 dwellings a greater than tenfold increase, will irreversibly change the way in which the historic settlements of Ockham areas perceived. Perception will no longer be of an evolved medieval parish in rural surroundings but of a much larger modern suburb with an historic periphery.

Development on this scale has never occurred within the Parish of Ockham or in Lovelace Ward and, even if well designed, cannot assimilate well into the fine grain and historic parameters of the parish settlements. The development fails to respond to the significance of Ockham’s listed buildings, its conservation area or wider setting in any positive way.

NPPF paragraph 137 states that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.’

Sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to preserving listed buildings or their settings and section 72 requires special attention to be paid to preserving or enhancing the character or appearance of conservation areas.

Justice Linblom stated that ‘...a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one.’ As such heritage conservation is to be given considerable weight and importance in the planning balance.

The proposal for the building of in excess of 2000 houses on the former Wisley airfield no way accords with any planning framework. More importantly it fails to meet statutory requirements and the substantial damage to historic heritage properties and the Ockham Conservation Area cannot be adequately mitigated. As such I strongly object to the inclusion in the Draft Local Plan of this site A35 (FWA) and it should be entirely removed from the GBC Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>pslp172/5404</th>
<th>Respondent:</th>
<th>8898401 / Mary-Claire Travers</th>
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<tr>
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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 impact of Guildford Borough Council Draft Local Plan on Heritage sites and Conservation Areas in Ockham

Despite its relatively close proximity to London and nearby towns Ockham has escaped suburbanisation. It has retained its distinct rural heritage and has not been subsumed within much larger conurbations. It remains a rural parish and retains its identity as an evolution of a collection of medieval hamlets where small houses nestle together in settlements with their own distinct character. The foundation of the local economy remains agricultural based around arable and livestock farming, equine recreation and game bird rearing.

The special character of the built environment in Ockham is acknowledged by the fact that 29 buildings have been listed by English Heritage. Many of the listed buildings are farm houses by origin. Their setting was and remains rural and agricultural. Upton Farm and Yarne are both 15th century farmhouses immediately adjacent to Three Farms Meadow and have views over it. Appstree and Bridge End have land adjoining Three Farms Meadow. The development of high density housing at Three Farms Meadow will cause irreparable damage to the setting of the listed buildings in Ockham and to the Ockham Conservation Area. The development, because of its location on the highest point of the hill and down the south side of the proposed site will overlook the Conservation Area and impact the setting of those precious and ancient buildings in the Ockham Conservation area causing substantial impact. The effect on the distinctive local Lovelace style would be wholly inappropriate.

The particular significance of the Three Farms Meadows is that it creates a meaningful green gap which enriches and strengthens the separate identities of the different settlements of Ockham. Consequently the separation provided by the green gap is a significant asset to both conservation areas and contributes to their character as distinctly separate settlements.

The most significant harm caused by the development proposals is that the scale of development overwhelms the historic settlements of Ockham which are quintessentially small in scale and historic in nature. Unlike many ‘commuter belt’ villages these settlements have escaped extensive redeveloped or extensive post-war expansion. Consequently they retain their evolved medieval form as well as most of their rural separation and setting. These are the characteristics which make them special and gave rise to the designations of Bridge End, Church End and Ockham Mill as a conservation areas.

The disproportionate scale of development in the appeal proposals is contrary to the natural evolution and growth which gave rise to the character of Ockham over the last 500 years. The result will be a revolutionary change in the shape and morphology of the Parish settlements which cannot fail to harm their distinct character.

The historic parish currently consists of 163 dwellings. The addition of another 2,100 dwellings a greater than tenfold increase, will irreversibly change the way in which the historic settlements of Ockham areas perceived. Perception will no longer be of an evolved medieval parish in rural surroundings but of a much larger modern suburb with an historic periphery.

Development on this scale has never occurred within the Parish of Ockham or in Lovelace Ward and, even if well designed, cannot assimilate well into the fine grain and historic parameters of the parish settlements. The development fails to respond to the significance of Ockham’s listed buildings, its conservation area or wider setting in any positive way.

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Comment ID: PSLPS16/1718  Respondent: 8899489 / A.A. White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Wisley Airfield still being included in the Plan when permission was refused in April.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4179  Respondent: 8900161 / Peter Gelardi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
2. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
3. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
4. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
5. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
6. I object to the extension of the plan period by 1 year as it has not been identified as a major change
7. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
8. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8900481 / John Burgess</th>
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<td>Also, I OBJECT to the proposed development on the former Wisley Airfield. Despite further proposed amendments (as part of the current appeal) they do not alter the fact that this is a wholly inappropriate development for this site the impact, of which, will be devastating for the surrounding communities. Much has been written about this proposal and I will therefore limit my comments to my belief that the proposed development lacks sustainability (in its broadest sense).</td>
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<td>The small changes to the land at Wisley (Three Farm Meadows) and therefore the continued retention of this land in the Local Plan for an enormous settlement remains totally unacceptable and is ill-founded and against the views of the vast majority of the population currently residing in East &amp; West Horsley, Ockham, Ripley, etc.</td>
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• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable publicly The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning.
Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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I wish to object to the proposed development of this site being included in the New Local Plan. This site is part of the metropolitan Green Belt and there are no exceptional circumstances to justify such a development. This was one of the 14 grounds of refusal given by Guildford Borough Council to the previous planning application. It would be a breach of the “Green Belt Rules”.

The location of the site adjacent to the A3 and M25 junction 10 is totally unsuitable for residential development. There would be extremely poor air quality and pollution from traffic including Nitrous Oxide from two major highways already at capacity. In addition the traffic from 4-500 vehicles from the new town would cause considerable more congestion on both the major roads as well as the local country lanes which surround this site.

There is no infrastructure at this site. All new mains services would need to be established as well as a new large scale sewerage plant. There would be considerable difficulties and costs to achieve such facilities. There would be considerable impact and pressure on the existing limited infrastructure and facilities serving the adjacent Horsley and Effingham areas. The massive increase in population would cause severe difficulties to schools, drainage, doctors surgeries, station parking, access to local shops, wildlife, flooding in places and gridlock on some roads.

It would be difficult to provide a sustainable public transport system from this site given the isolated location, surrounded by country lanes and the problems and delays from the A3 and M25. The reliance on cars from the new town would not be sustainable.

There are also no local employment opportunities in this area. There would be serious impact on access to the RHS Wisley Gardens from the increase in traffic compounding existing access issues due to the proximity of the A3 and M25 interchange.

The recent Brexit decision should reduce the number of new houses required whilst Guildford BC housing projections are unnecessarily well above the national average.

This site should therefore be removed from the New Local Plan as the long term damage and effect will destroy the nature and character of this area and the quality of life for the existing residents,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. I objected to that planning application for the very same reasons that I am objecting to its inclusion in the local plan.
- After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
• Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1892  Respondent: 8901761 / Michael and Ceril Brooke  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads - there are already significant congestion issues on Old Lane and Effingham Common Road during peak hours - there is no capacity for this level of increase especially when also considering wide vehicles including increased bus and HGV movements
  3. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/ A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  4. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity with dangerous parking on the verge of Effingham Common Road already a regular occurrence. It is simply not believable to assert the residents will look to go to other stations in the area given the proximity of Effingham Junction and West Horsely stations.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI ) and Site of Nature Conservation Interest (SNCI ).

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2558  Respondent: 8901921 / Diana Ashby  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
15) Finally, I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC’s Planning Committee on 6th April 2016 after 14 months of negotiations and apparently unlimited resources, experts and advisors (and various extensions and amendments) on the recommendation of GBC Planning Officers. Serious concerns were raised by authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency, as well as SCC and Elmbridge BC.

I ask that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, be removed from 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:** pslp172/3656  **Respondent:** 8901921 / Diana Ashby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of Policy A35, Three Farms Meadows, in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site in this plan because of the constraints on the site and the physical location.
2. It is too far from railway stations.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10)
4. Local roads are at capacity particularly when the A3 is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 per annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000's more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. It remains unclear when/if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
10. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
11. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will adversely impact the views from the AONB.

12. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

13. I object to para 21 which "limits" development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding rural area.

15. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000's of objections from local residents and statutory consultees.

16. I object to the Proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

17. I object to the Council wasting tax payers and residents' time and money not following due process and indeed ignoring previous representations.

18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

20. I object to the transport evidence base which has been criticised for using out of date modelling software and is therefore unreliable.

21. I object to the housing number which I believe is unsound.

I consider for the reasons listed above and other reasons, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Wisley Airfield

Having been unanimously objected to by GBC on 6th April, it is back on the agenda. It is clear that there are insurmountable difficulties facing the development of this site and it should be removed without further consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.

* No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the continued inclusion of the plan to build over 2000 houses on the site of the former Wisley Airfield (policy A35). I watched the podcast of the planning meeting concerning this development and saw it unanimously rejected by the planning committee. I was appalled to find that it is still in the Local Plan.

Apart from the fact that this is Green Belt land, the infrastructure won't cope. For example, our house is on the crossroads at Effingham Junction right near Effingham Junction Station. Effingham Junction would be the nearest station to the development and the car park is already full on weekdays. (I believe Horsley Station is also full to capacity). Every morning rush hour during term-time there is a long queue of cars past our house. The road is already overloaded without the cars from a new town being added to them – and don't suggest that people should walk or cycle to the station along Old Lane, because the road safety implications are awful to think about. I saw some suggested changes to the local road system (I would be reluctant to call them improvements) and there was nothing on the scale that would accommodate the traffic from the proposed new town. In addition, the A3 and the M25 are already often seriously congested, without the additional cars from a new town close to the A3/M25 junction.

Furthermore, I went to a meeting where the proposals for the new town were described, and it seemed to me that even the cheapest houses would be too expensive for local young people trying to reach the first rung of the housing ladder. That means to me that the proposal wouldn't even help to meet the main housing need in the area.

My husband and I already have concerns about the air quality here with so many vehicles, especially diesel ones, passing our house during the day. This would get much worse if there were a new town just up the road and I believe there would be air quality problems at the new town itself especially for the proposed new school close to the A3.

In summary then I consider that the scale of the proposed developments in this area is hugely excessive, so I object to the Proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the continued inclusion of policy A35, involving building a new town on the former Wisley Airfield. In my view the local infrastructure is absolutely insufficient to support this huge increase in population. The local roads, both major and minor are already overcrowded. The A3 and M25 and where they meet at Junction 10 is all very busy. In addition, for many years there has been a solid queue of traffic past my house at Effingham Junction during the morning rush hour during term time without the addition of cars from the proposed new town.

Another problem is the air pollution resulting from these busy roads.

Also Effingham Junction would be the nearest railway station and the car park already has no free spaces on weekdays.

I watched the podcast of the rejection of the planning application and was hoping that this proposal would have been dropped!
As well, the thousands of objections from local people appear to have been ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5875  **Respondent:** 8902945 / Richard Mulhall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Ref:** Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings

Dear Sir

I wish to object to the inclusion of the former Wisley Airfield in the Guildford local plan because:-

1. The land is Green Belt and there are no exceptional circumstances for it to lose its Green Belt status. The removal would allow urban sprawl to reach from London to Guildford.
2. Such a huge development would threaten the historic rural settlements of Ockham, Hatchford and Downside.
3. With such a large development and the subsequent increase in cars in and out of the site, it would cause chaos on the rural roads leading to Cobham which would be the nearest shopping centre.
4. The area is already experiencing high levels of air pollution due to the M25 and A3, these extra cars will make this much worse and therefore cannot be justified. Guildford BC need to be devoting resources to reducing this air pollution not deliberately adding to it.
5. The area includes SPA, SSSI and SNCI classifications and a major development would threaten these important safeguards.
6. A previous planning application was rejected and therefore it has already been established that this is not a suitable area for development.

I live only a couple of miles from the former Wisley airfield so I know the area and recognise the damage a large development like this would inflict on the local residents of both Guildford and Elmbridge boroughs.

Please remove this from the Guildford Local Plan as it is totally inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6682  **Respondent:** 8903169 / Andrew Hooks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The scale of the Wisley airfield development, and the pressures this will put on local infrastructure and services

The scale of the proposed Wisley Airfield development is hugely out of keeping with the local area, and a development of that magnitude will have an unsustainable impact on our shared infrastructure, not least on the A3 which already experiences long tailbacks at peak times around the Ockham Park and M25 junctions (which will be those most burdened by the addition of such a large, new town on the airfield site) and on the already overcrowded South West Trains railway service from Horsley into London and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7700  **Respondent:** 8903745 / Peter Davis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- The Health and Safety implications to the inhabitants of the proposed Wisley Airfield development are significant. The site is located close to one of the busiest junctions in the country, M25/A3. The Nitrous Oxide emissions recorded around this area are extremely high and will affect residents. The proposal to build new primary and secondary schools at the site is counter to government policy prohibiting the building of schools on such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5808  **Respondent:** 8903841 / Anne Tutt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed "new town" at Wisley airfield is land that should be sold to the Royal Horticultural Society to bring work and day visitors to the area, not earmarked for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/723  **Respondent:** 8904161 / Geoffrey & Lesley Tregaskes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposal to remove the Former Wisley Airfield (FWA/TFM) from the Metropolitan Green Belt. The only justification for this is to use it for housing which is not an exceptional circumstance. I therefore object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration the planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environmental Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1694  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8.1 object to the removal of the Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt

9.1 object to the continued inclusion of the former Wisley Airfield where the planning application has already been unanimously rejected by GBC's Planning Committee on 8th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency

10.1 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.

11.1 object to the detrimental impact on transport, local roads and road safety these housing proposals will bring to this area, with its narrow rural roads, few pavements, almost non-existent street lighting - country lanes used regularly by sports cyclists and horse riders. The increased traffic, let alone increase in HGV traffic, will exacerbate the existing dangers to cyclists, pedestrians (especially children) and horse riders, and to road traffic generally as the roads are not wide enough places to allow two large vehicles to pass in object to the detrimental impact on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in ham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements The photograph at AppendixI illustrates the
inadequacy of ORN to handle any of this extra traffic accessing East Horsley station (by a 5 way uphill intersection), medical centre and shops.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Road access to Horsley Station is by a very steep uphill five way intersection.

6. **I object** to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservat ion Interest (SNCI).

7. **I object** to the fact that air quality concerns have not been taken seriously particularly at the M25/A3 junction, is already in excess of EU-permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2937  Respondent: 8904161 / Geoffrey & Lesley Tregaskes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of Three Farms Meadows (and at former Wisley Airfield) in the Guildford Borough Council Plan under policy A35 for the following reasons:

1. It remains unclear when/if the Ockham DVORIDME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights.

2. I remain unconvinced that a company based in an island tax haven can be held to account to provide all it says it will in the way of infrastructure unless prior to building commencing, all the infrastructure is put in place for a development of this size. It is notable that another authority in the west of England insists on infrastructure being in place before the first house or office or other building is commenced.

3. Elsewhere in the plan, land in the Tongham/Ash area newly designated as Green Belt, is protected as it provides an important open gap between Ash/Tongham and the Aldershot conurbation. If Green Belt protection is considered necessary in that area of the borough, is it not even more necessary in this area of the borough where the Parish and hamlets of Ockham, provide an important open gap between the urban areas of Elmbridge BC and the London Metropolitan area and other more densely populated areas of GBC.

I therefore STRONGLY OBJECT to Policy A35, the creation of a new settlement at the former Wisley Airfield, and require confirmation that all these comments, together with my previous ones are passed to the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3607  Respondent: 8904577 / Angela Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I continue to object to the inclusion of Policy A35 Three Farms Meadow (TFM) in the draft plan for numerous reasons including those written below:

1. I object to the number of houses in this plan, and particularly in relation to the Green Belt, Air quality, AONB, TBHSPA etc. I believe this is totally inappropriate and open to legal challenge.
2. I object to the fact that the Council has totally failed to take into account the 1000’s relevant objections which have been lodged over a period of time to this Local Plan.
3. It is directly adjacent to RHS Gardens one of the most popular visitor attractions in Surrey. Each year sees an greater increase in the numbers that visit Wisley. I do not believe this has in any way been properly considered.
4. Any increase in Public transport on these already congested roads will adversely affect the whole network of connecting roads, increasing the danger to road users living in these areas.
5. Its distance from railway stations, and the increase of traffic this will bring. this is in an area already struggling with increased traffic volume.
6. It is in the immediate vicinity of one of the most congested areas of the A3 and the M25. There are almost weekly incidents on this stretch of road causing blockages in the Horsleys, Ripley and the Clandons, any significant increase in the traffic would bring the whole area to a complete standstill. There are times when this already occurs.
7. This area has by design seen a vast increase of use by cyclists already causing traffic problems. Any further increase in traffic will make these lanes even more hazardous for drivers and cyclists alike.
8. I object to the change of the site boundaries on the southern side facing the Surrey Hills. This will negatively impact on the view from this designated area of Outstanding Natural Beauty.
9. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. There is no explanation why the Council think it is appropriate to have a Regulation 19 consultation when the changes are major.
10. I object to the quantity of space allocated for retail in the town centre. This could easily be used for residential development. I particularly object to the dependance on the Carter Jonas study update 2017 which includes demand for retail space from Companies already in administration.

I consider from my objections listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6720  Respondent: 8906561 / Ian and Angela Coutts-Wood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
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   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7164  Respondent: 8906945 / Ken & Pat Homewood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are astonished and must register our objection that The Wisley Airfield site at Ockham is still in the plan as it was rejected by GBC’s Planning Committee and as far as we can see none of the issues which caused its rejection have been adequately addressed. The plan that has been re-presented for the site of 2,000 new homes is still totally impractical as, although it claims to have addressed the infrastructure issues, it obviously has NOT. In particular, the secondary school capacity in the area, and the more than doubling the commuting traffic on the local roads which are currently inadequate for the existing traffic flow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3813  Respondent: 8907265 / Jan Brind  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
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4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farm Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Although we do not reside in the Borough of Guildford, my wife and I are very frequent visitors there, because our daughter, son-in-law and their three children have lived in Ockham Lane bordering on Wisley Airfield/Three Farms Meadows for ten years.

I object to the draft Local Plan for the following reasons:

1. I object because by far the greater part of the new housing is proposed within the Green Belt, when there is a large amount of brownfield land in the urban areas which needs to be regenerated.
2. I object to the disproportionate allocation of housing in this particular part of the borough: over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.
3. I object to the threat the Local Plan poses to the historic rural village of Ockham and the multi-faceted harmful effect on properties there.
4. I object to the detrimental impact on transport, local roads and road safety - i.e., the increased volume of car and delivery traffic and the resulting congestion on major and minor roads in the area, as well as at local stations where parking is already at full
5. I object to the detrimental effect of the Local Plan on the environmental and ecological value of the site and that air quality concerns have not been taken seriously.
6. I object to the fact that the proposed plan does not meet the needs and desires of local communities as per the Ockham Parish Plan.
7. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been rejected by GBC's Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3087  Respondent: 8907393 / Helen Cannon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

7. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

8. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. I live on a main road in Ripley which is already very over used, when there is no congestion cars travel far too fast making it a danger to pedestrians and no one has yet managed to curb this problem.

9. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

10. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

11. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

12. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

13. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

14. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

15. 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.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The large-scale proposal for Wisley Airfield is totally unsuitable for the area, primarily because of increased pressure on already stressed infrastructure. As this is less than 2 miles from Horsley (the nearest train station) presumably there would be a significant increase in the number of commuters using this service. Already, rush hour traffic on Ockham Road is heavy, trains are overcrowded and there is little available parking space at the station so this development could make the situation unbearable. There would also be a negative impact on the environment and presumably an increase in safety issues with so many additional households accessing the A3 at one single point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/936  Respondent: 8909185 / Jamie Hogg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My objections are:

Site A35 Former Wisley Airfield

I object to the proposed increase and any plan to develop this site.

- The size increase to 95.9 hectares. The resulting increase in traffic volumes will compound exiting problems with the local road network none of which have the option of being further developed to cope with the additional traffic flow
- Nitrous Oxide levels are already above safe levels

Green Belt

- This is a massive encroachment of the Metropolitan Green Belt and would be inappropriate development (as defined by law) within that.
- The proposals would harm the rural landscape character of the area and the openness of the green belt having a negative impact on views from all over North Surrey including from Painshill Park Landscape Gardens.
- Contrary to Green Belt policy the proposals would create on open country a line of building that will start to merge settlements (urban sprawl).
- The protection of the green belt is this generation's responsibility.

Impact on the local area

- The additional 5,000 residents is the equivalent of adding 50% to the population of Cobham, Downside and Hatchford
- The proposed housing density is completely out of keeping with the surrounding rural area – multi-storey buildings are not appropriate in a rural environment
- The resulting impact on light pollution, traffic and infrastructure has been gravely underestimated. Suggested measures in mitigation are totally inadequate
The cumulative impact of development on the neighbouring boroughs of Elmbridge and Mole Valley has not been taken into account. The air quality surrounding the site of the proposed development gives grave cause for concern as levels of NO2 already exceed the EU limit due in part to the proximity of the M25, the A3 and Cobham services. The closure of Plough Lane between Cobham and Ockham and other local roads coupled with a massive increase in traffic will impact a large number of local road users.

**Sustainability**

- Any site that is dependent on the use of private motor car cannot be considered justifiable.
- The proposed public transport provision is unrealistic given the nature of the roads in question. The suggestion that residents will walk or cycle to a rail station on narrow, winding, unlit roads without pavements or cycle lanes is incredible.
- A suggestion of use of Cobham & Stoke D’Abernon Station by the new population would, even if plausible, add to congestion, parking difficulties and pollution.

**Nature**

- This huge proposed development would damage habitats of the protected and endangered rare species in contravention of the EU Birds Directives and Habitats Regulations.
- The siting of a proposed Suitable Alternative Natural Green Space adjacent to the Thames Basin Heath Special Protected Area and Sites of Scientific Interest will only increase visitor numbers causing further damage to that.
- The introduction of pets as well as humans is what devastates wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2611  **Respondent:** 8910081 / Sheila Sutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

The 2000 houses at Wisley Airfield, which has been refused recently, I see has been brought up again. This really would bring the traffic to a halt. It is quite often completely stopped along the A3 towards Guildford, on a Monday morning. What would it be like with even more cars trying to join the A3 from Wisley Airport. Quite apart from the other infrastructure problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4345  **Respondent:** 8910273 / Colette Clegg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3763  Respondent: 8910977 / Imogen Jamieson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe, putting my family and others in danger.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. RHS Wisley traffic already cause frequent congestion by traffic on local roads – there is already vulnerability and this will get worse.

1. The associated traffic increase from the RHS has not been taken into account.
2. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis – again, more danger and potential fatalities.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB and destroy the far reaching countyside views for future generations. Surely there is a responsibility to maintain this?

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees – Why bother to consult if you then ignore the overwhelming popular view?.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

It is my belief bearing in mind the reasons listed above from a not exhaustive list that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7175  **Respondent:** 8911617 / Charles Hope  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The inclusion of the "new town" at Wisley is ridiculous since it has already been unaninimously rejected by GBC. Most of the grounds for this rejection were environmental and these grounds will not go away.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6936  **Respondent:** 8911649 / Chris Spratt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I remain opposed to any re-designation of local Greenbelt land in order to build homes. The local infrastructure cannot cope with the current population as it is. For example, the M25 and A3 main routes are already some of the busiest stretches of road in the South-East, often congested, or impassable due to accidents. Protection of the Greenbelt was an election promise of the Conservative Party which I believe you should adhere to in the interests of all local residents.

I believe the proposals to put 2000 homes at the Wisley airfield represents significant over-development. For the proposed school to be built 8 years into the development will only increase the pressure on local roads, which already have poor drainage and surface conditions. Ockham Road North and Ockham Road South are prime examples of this.

I believe the Council should be challenging the arbitrary Government targets on housing and scaling back the plans considerably.
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6915</th>
<th>Respondent: 8911809 / Ockham and Hatchford's Residents' Assoc. (Emily Hayward)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. 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 object to the detrimental impact on transport, local roads and road safety.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.
- After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
- Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/8050</th>
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</table>
Wisley development has been rejected some 14 times. The area is greenbelt with a short concrete runway which was meant to be restored by the govt, to its original state, after the war.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3769  Respondent: 8914273 / Sabina Paton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• 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.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5822  Respondent: 8914465 / John & Elizabeth Maycock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 inclusion of this site yet again in the latest draft of the Local Plan as a strategic site for development.
I find it almost farcical that, having rejected the last planning application for this site decisively a few weeks ago on clear and logical grounds, the site appears yet again in the draft Local Plan with much the same proposal for development attached to it.
What has changed in that few weeks or is it that the Borough Council is in desperate need of housing numbers to put in the box marked new houses required by the Government and this satisfies some of that requirement? There is scant regard for any of the requirements for building in the Green Belt, for the effects on local roads and transport infrastructure, for the local environment, for the increased risk of flooding, schooling or health support - the very reasons on which the last application was rejected.
The arguments against building in the Green belt remain the same. Removal of the site from the Green Belt can only be made on exceptional circumstances and the Local Plan provides no clues as to what these may be. Unfulfilled housing need is not an exceptional circumstance for these purposes.
I also object to the inclusion of this site on the grounds of poor sustainability. It has no transport links or other services, no schooling, shopping or medical services all of which will have to be provided from the existing already overburdened services elsewhere or provided from new. The number of houses proposed will inevitably generate a massive increase in vehicle use of narrow roads and add to the existing problems at the A3/M25 junction 10. At two cars per dwelling average, there will be an increase of some 4000 extra vehicles on local roads. The further addition of passengers on the trains at East Horsley and Effingham stations will be difficult to manage as there is almost no excess parking available at either station now. The same difficulty will arise in relation to parking at the shops in East Horsley.
As the area immediately surrounding the site is prone to flooding, any development will require very extensive improvements to surface and waste water infrastructure to cope with the increased surface water run off and increased need for sewerage. The existing infrastructure will simply not cope with such an increase in population.

The proposal is out of keeping with the established pattern of development in the area. Ockham village currently numbers 159 dwellings and its present setting will effectively disappear. The proposed development would be the largest in Guildford Borough other than Guildford itself. Density would be about 49 dwellings per hectare. East Horsley is presently the largest settlement outside Guildford town, having 1760 homes at a density of 8.1 dwellings per hectare. The disparity is stark and it is clear that the proposed development is wholly out of local context and even appears to breach Guildford Borough Council's own proposed Housing Policy (H1).

I object to the allocation of housing in this part of the Borough. 23% of the Local Plan's new housing is proposed in the localities of Ockham, Ripley, Send and the Horsleys and of this 65% is allocated to the former Wisley Airfield. This is disproportionate in relation to the Borough as a whole.

I object to the policy A35 and the proposed development at the former Wisley Airfield and ask that it be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6500  **Respondent:** 8915297 / Brenda Chamberlain  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), Sound? ( ), is Legally Compliant? ( )**

**Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).S2

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As before I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

I believe it is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location. It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the most popular visitor attraction in the south-east.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”. Opportunity (3) should be common to all sites and is not unique to this site

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the removal of additional 3.1 ha from the green belt without any justification.

Development should be excluded in flood zone 2 and 3 not limited

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. The council has not explained why they think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

[Attached documents:]

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<th>Respondent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible place for 2100 houses, when the the planning committee have unanimously refused planning permission.

I object to the inclusion of the site known as Wisley Airfield in the local plan as it goes against the localism the government are trying to foster. The local people don’t want it. The statistics that form the basis of the inclusion are flawed, but not changed.

I object to the awful impact a development on Wisley will have on transport, local roads and road safety.

I object to more cars, 4000 is the estimate, flooding into the narrow lanes that cyclists are being encouraged to use. The danger is obvious to all except the Council.

I object to the proposition that the development will result in a meaningful shift to cycling and walking, of course it won’t as there are no transport links the new residents will use their cars.

I object to the developers saying that a bus service would be laid on to take the residents to the local stations. We all know it will not be a permanent service and will wither on the vine as time passes and residents use their cars. Again it is obvious - except apparently to the council.

I object to any further increase in cars in view of the expansion of Wisley Gardens. The Ripley roundabout is dreadfully congested when they have an event drawing in a further 5000 cars or so. The queue goes back to the M25/A3 junction even causing dangerous queue on the Motorway itself.

I object to the detrimental effect the development would have on the character of the area. The houses that are proposed are completely out of keeping with the whole area.

I object to the fact that even though the local people don’t want it, even though the planning committee have unanimously rejected it, the Council are still determined to have it included in the Local Plan.
I object to the incredible bad effect the development will have on the environment and the local special sites.

I object to the Council trying to force people to live in an atmosphere poisoned by fumes from the M25/A3.

I object to the fact that Guildford Borough Council are completely ignoring the Ockham Parish Local Plan,

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7362  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy A35 (Wisley Airfield)

On April 6th 2016, Guildford Borough Council voted unanimously to reject planning permission for 2100 houses to be built on a site at Three Farm Meadows in Ockham, by the former Wisley airfield. This site should never have been included in the Draft Local Plan especially in the light of section 150 of the Housing and Planning Act 2016 which states that sites identified in a local plan are assumed to have permission to go ahead in principle. It is completely illogical to include the development of a site which has already been rejected by the council. The fact that this is even included in the Draft Local Plan demonstrates that this plan was not ready for consultation – once again, the Draft Local Plan doesn’t make sense.

I object to the development of a new town at the former Wisley Airfield site as the land is within the Green Belt and the provision of 2100 new houses, equating to around 5355 people, would place enormous strain on the Horsleys and all the surrounding villages.

The Former Wisley Airfield site is valuable farmland which is being worked. The fact that a temporary airstrip was built on the promise that it would be removed when it was no longer required would seem to me to be an unreasonable basis for now considering it for development. This site is very important in ‘checking the unrestricted sprawl of large built up areas’ and preventing continuous corridor of urbanisation along the A3 corridor. Developing this land is inappropriate development in the Green Belt as defined by the NPPF paras 88 and 89 and sets an unacceptable precedent when we should be protecting the Green Belt for future generations.

The A3/ M25 junction is extremely busy most of the day with very high levels of pollution. The increased traffic and potential development of the Ockham/ Wisley Junction would make these roads more complicated, prone to delay and have a significant impact on pollution. We shouldn’t be building residential properties in an area which already has unacceptable levels of air pollution.

Since this area of land falls within 400m – 5km of the Thames Basin Heath Special Protection Area (SPA) it would seem to me to be an inappropriate area to be developing. I can’t believe that incorporating a Suitable Alternative Natural Green Space within this development will deliver enough respite for the Effingham Common. With this size of development alongside the proposed increase in housing in East and West Horsley and Effingham, there would inevitably be quite a dramatic impact on these Special Protection Areas. The increased use of the common land by dog walkers in particular could not be avoided.
If this development were to go ahead it would have a devastating effect on the surrounding villages. The proposed housing density of this site is completely out of keeping with the surrounding rural area. There would be a huge increase in the number of cars on the surrounding country roads and alongside the suggested road closures there would be a serious increase in traffic congestion and danger to pedestrians. There also needs to be a lot more investigation into the effect that such a development would have on water levels and the increased risk of flooding in the area.

Development on this scale needs to be sustainable and yet this new site won’t provide any additional employment. Access to the two nearest train stations would need to be by car as the roads are unlit and many don’t have pavements. The available parking at these two stations is already at capacity.

This site is not listed for development under the existing 2003 Local Plan. The amount of housing that is actually needed in the borough is yet to be established and there are no special circumstances that would allow this development of Green Belt land so I hope that Guildford Borough Council will remove this site from their Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8. failed to secure an appropriate provision of affordable housing;
9. was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
10. would result in loss of the safeguarded waste site;
11. presented a dense and urban form of development owing to its quantum and scale;
12. had an adverse impact on the setting and significance of a designated heritage asset;
13. had an unacceptable air quality impact;
14. impacted on education infrastructure;
15. impacted on policing infrastructure;
16. impacted on health infrastructure;
17. impacted on library provision.

1. Both similar and other objections and concerns had been raised by OPC, neighbouring borough and parish councils, Surrey, Thames Water, NATS, the Environment Agency, Police Authorities, Highways Authorities, residents’ associations, in context of the planning application and in relation to the current and earlier GBC draft Local Plans.
2. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt. To remove the site from the Green Belt or its development. To the contrary there are overwhelming reasons for retaining the site as Green Belt for the benefit not only of Ockham and surrounding villages but also the wider community.
1. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath SPA.
1. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the dangers and possible illegality of increasing pollution and decreasing air quality as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding area.
1. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.
1. The total unacceptability and disproportionality of the threat posed to Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, Conservation Areas and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased over 15 times.
1. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of Ockham and the emerging Lovelace Neighbourhood Plan.
1. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and roads (plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity.
1. The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which at least 19.3ha is classified as best and most versatile land – Grade 2 and Grade 3a).
1. The fallacious nature of claims made that FWA/TFM should be regarded as “brownfield” or previously developed. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA, and the remainder of the old runway is (of course) flat where any development exists that the adverse consequences of development of the site, including damage to the ecology of, e.g., the SPA, cannot be mitigated.
1. The impossibility in practical terms of creating a sustainable development on FWA/TFM which is further demonstrated by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development plan.
1. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and the RHS at Wisley.

CONCLUSION

The above objections graphically demonstrate why FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make the site totally unsuitable for any kind of significant development – as OPC and others have consistently argued.
The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development amounts to disregard for widespread local and further afield opinion.

The repeated attempts in numerous guises over the last 3 years to take FWA/TFM out of the Green Belt and to press for both major and ancillary development of the site have, as OPC has previously pointed out, stretched the patience and goodwill of local communities, not least Ockham Parish, have imposed heavy and unwarranted costs and other burdens on those local communities, have caused a blight on the area, distress to local residents and farming businesses, and have adversely prejudiced peoples’ lives and livelihoods.

OPC therefore strongly OBJECTS to this further and unwarranted attempt to exclude FWA/TFM and other parts of Ockham Parish from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2049  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Representations attached:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  OPC Objection Letter to FWA Application.doc (99 KB)  Outline planning permission (Amended Description)Three Farms Meadows (fo...doc (67 KB)

Comment ID: PSLPS16/3299  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)

I refer to Ockham Parish Council’s letter of objection dated 12 June 2016.

It has now come to the attention of Ockham Parish Council (OPC) that paragraph 11 of that letter significantly understates the area of the best and most versatile agricultural land at the former Wisley airfield (FWA) otherwise known as Three Farms Meadows (TFM).

Paragraph 11 should therefore read:

“The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which 45.4ha * is classified as best and most versatile land – Grade 2 and Grade 3a).”

*rather than only 19.3ha as previously stated.

I apologise for the error in OPC’s earlier letter.
For the avoidance of doubt, I should also point out that the description and maps of “the Former Wisley Airfield” contained in the volume “Guildford borough Proposed Submission Local Plan: strategy and sites” include an area of land to the east of Hatch Lane and bordering Ockham Lane (“additional land”) which is not and never has been part of the former Wisley airfield and which is not in the ownership of Wisley Property Investments Ltd. OPC’s objection to the inclusion in the Local Plan of FWA/TFM also applies to this additional land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3508  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. The continued inclusion in the Local Plan of the former Wisley airfield (which is located in Ockham and which is known locally as Three Farms Meadows) is perverse and illogical, and is unsound for reasons of sustainability, deliverability and need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3509  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), I OBJECT to the inclusion of that site in the Local Plan on the grounds that:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.

1. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of a new settlement of over 2000 dwellings at FWA/TFM was after 14 months decisively and unanimously rejected by GBC on 8 April 2016 following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

1. was an inappropriate development within the Green Belt;
2. would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;
3. failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;
4. failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
5. was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
6. would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;
7. failed to deliver the required transport sustainability measures;
8. failed to secure an appropriate provision of affordable housing;
9. was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
10. would result in loss of the safeguarded waste site;
11. presented a dense and urban form of development owing to its quantum and scale;
12. had an adverse impact on the setting and significance of a designated heritage asset;
13. had an unacceptable air quality impact;
14. impacted on education infrastructure;
15. impacted on policing infrastructure;
16. impacted on health infrastructure;
17. impacted on library provision.

1. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt. There are no exceptional or very special circumstances justifying removal of the site from the Green Belt or its development.
2. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath Special Protection Area, a SNCI and a SSI.
3. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the dangers and possible illegality of increasing pollution and decreasing air quality as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding area.
4. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.
5. The total unacceptability and disproportionality of the threat posed to Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, Conservation Areas and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased over 15 times.
6. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of Ockham’s population, as evidenced in the existing Ockham Parish Plan and the emerging Lovelace Neighbourhood Plan.
7. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road safety, with increased vehicle movements (an estimated 4000 additional cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity, and on local services and infrastructure.
8. The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which 45.4ha is classified as best and most versatile land – Grade 2 and Grade 3a).
9. The fallacious nature of claims made that FWA/TFM should be regarded as “brownfield” or previously developed. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA.
10. Much evidence exists that the adverse consequences of development of the site, including damage to the ecology of, e.g., the SPA, cannot be mitigated.
11. The impossibility in practical terms of creating a sustainable development on FWA/TFM which is further demonstrated by the historical use of and lack of development on the site, and most recently by the inability of
the current landowner/developer and its many experts and advisers to come up with a sustainable development plan despite numerous attempts over an extended period.

1. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and the Horsleys, and the impact on the future development plans of the RHS at Wisley.

The above objections graphically demonstrate why FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make the site totally unsuitable for any kind of significant development.

The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and decisions, and amounts to disregard for widespread local and further afield opinion.

I therefore strongly OBJECT to this further and unwarranted attempt to exclude FWA/TFM and other parts of Ockham Parish from the Green Belt and thereby to encourage development thereon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7240  Respondent: 8916161 / Margot Williams  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In general, if there are insufficient homes planned in this 2016 process within the town & village boundaries, then development must go on the brownfield site at Wisley Airport rather than on the key greenbelt habitats described above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2158  Respondent: 8916353 / John Franklin  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8  I object to the proposal within the Draft Local Plan for the development of Wisley Airfield. Such a new town within the Green Belt is totally unacceptable. It will swamp the local villages, communities and facilities. It is hard to credit GBC is putting itself behind such a proposal.

9  All points made in my previous letter of Sept 2014 commenting on the 2014 Draft Local Plan are also applicable to this 2016 new Draft Local Plan.
I am writing to STRONGLY OBJECT to the continued inclusion of the former Wisley airfield now known as the Three Meadows as a strategic site in the local plan.

I object to the total disproportionate number of housing in this part of the borough it is a massive encroachment on the green belt. It is ridiculous for over 2000 houses to be built in a village that's train station is already at maximum capacity, as are the schools and doctors. The infrastructure required for such a massive influx of people would need an entirely new village. The country roads would prove extremely dangerous to have over 2000 cars on top of the already narrow and busy roads.

I object as it would totally ruin the beautiful and historic village of Ockham that has been lived in for generations of families.

To conclude I once again fully and wholeheartedly object to the inclusion of the former Wisley airfield now known as the Three Meadows as a strategic site in the local plan.

Take it out. Save this beautiful village for future generations in this already rapidly decreasing green land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This huge development proposed on good agricultural land would cause significant harm to Ockham Common which is now an international recognized Nature Reserve a 'Special Protection Area' and a 'Site of Special Scientific interest. Damage would occur to the habitats of a number of protected and endangered species. Ockham has been a settlement for over a 1000 years, is recorded in the Domesday Book and has many historic houses, in particular those special flint and brick 'Lovelace' houses/cottages and it is outrageous to imagine this development ruining the village of Ockham. It must never happen, we have a duty to preserve our villages. 

No real account has been taken of how this development would effect the neighbouring villages....the density of the development is far in excess of the surrounding neighbourhoods , the five story buildings are not appropriate in rural surroundings and the re routing of the roads through the villages for this development would be a total disaster and would not work at all...Far too many cars from 2100 homes including those existing cars would be speeding down our lanes which are narrow and have no footpaths or verges - these are dangerous enough now especially in commuter times especially to cyclists ,people riding horses, tractors and pedestrians. In many places the lanes are only one car width so they are totally unsuitable for any more traffic going to stations, schools, surrounding towns to shop etc.the traffic would disperse through all the country lanes and they would become incredibly dangerous. The railway stations of Effingham Junction and East Horsley are both at maximum capacity already. We use East Horsley station and it is very difficult to park there and even to drive in and drop off at busy times you have to queue up the entrance road ...it is absolutely ridiculous to think of residents from 2000 new houses trying to use these stations as well. Doctors surgeries/ Hospitals and schools in the area are already at maximum capacity... this proposed development would also have a negative effect on the Water Table and flooding would be a huge problem and an enormous amount of additional sewerage would be produced when again this is at maximum capacity in the area.

We live in a listed house the oldest part dating back to Elizabethan times and we feel a responsibility for it for future generations so that it continues to be situated in a rural environment...

I Completely Support the Objections to the building of this new town on the former Wisley Airfield and objections to the inclusion of it in the Local Plan put forward by the Ockham Parish Council, Ockham and Hatchford Residents Association and the Wisley Action Group.

.. Please consider these objections fully and take the Former Wisley Airfield ( Three Farms Meadow) Allocation A35 out of the Local Plan

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the housing number of 683 houses per year from West Surrey Strategic Market Housing Assessment (SHMA) as far too high...

I object to the totally disproportionate allocation of housing in this particular part of the Borough. - over 23 per cent of the Plans new housing is in area of Ockham, Ripley, Send and the Horsleys... This are at present has only 0.3 per cent of the population of Guildford Borough This would be the greatest example of disruption to the Green Belt in the whole country if this development goes ahead.

This is a massive encroachment on the Green Belt and I again repeat all the reasons why I continually have objected to these proposals as I live with my family in this area in an old house in the historic village of Ockham which your proposals would destroy.

This huge development proposed on good agricultural land would cause significant harm to Ockham Common which is now an international recognized Nature Reserve a ' Special Protection Area' and a ' Site of Special Scientific interest. Damage would occur to the habitats of a number of protected and endangered species. Ockham has been a settlement for over a 1000 years, is recorded in the Domesday Book and has many historic houses, in particular those special flint and brick 'Lovelace' houses/cottages and it is outrageous to imagine this development ruining the village of Ockham. It must never happen, we have a duty to preserve our villages.

No real account has been taken of how this development would effect the neighbouring villages....the density of the development is far in excess of the surrounding neighbourhoods , the five story buildings are not appropriate in rural surroundings and the re routing of the roads through the villages for this development would be a total disaster and would not work at all...Far too many cars from 2100 homes including those existing cars would be speeding down our lanes which are narrow and have no footpaths or verges - these are dangerous enough now especially in commuter times especially to cyclists ,people riding horses, tractors and pedestrians. In many places the lanes are only one car width so they are totally unsuitable for any more traffic going to stations, schools, surrounding towns to shop etc:the traffic would disperse through all the country lanes and they would become incredibly dangerous. The railway stations of Effingham Junction and East Horsley are both at maximum capacity already. We use East Horsley station and it is very difficult to park there and even to drive in and drop off at busy times you have to queue up the entrance road ...it is absolutely ridiculous to think of residents from 2000 new houses trying to use these stations as well. Doctors surgeries/ Hospitals and schools in the area are already at maximum capacity... this proposed development would also have a negative effect on the Water Table and flooding would be a huge problem and an enormous amount of additional sewerage would be produced when again this is at maximum capacity in the area.

We live in a listed house the oldest part dating back to Elizabethan times and we feel a responsibility for it for future generations so that it continues to be situated in a rural environment...

I Completely Support the Objections to the building of this new town on the former Wisley Airfield and objections to the inclusion of it in the Local Plan put forward by the Ockham Parish Council, Ockham and Hatchford Residents Association and the Wisley Action Group..

. Please consider these objections fully and take the Former Wisley Airfield ( Three Farms Meadow) Allocation A35 out of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly as I have done before to the inclusion of Three Farm Meadows in the Draft Local Plan for so many reasons ....

-it is Green Belt land and I object to the change in the Green Belt boundary to the eastern end of the site

- it is a totally unsuitable site for development because of the constraints on the site and the physical location..

- the site is so very close to the most congested road network( A3 and M25) and most congested M25 junction of all (junction 10)

- it is also adjacent to RHS Wisley where visitor numbers will increase by 500,000 per annum. So this means more traffic.

- the roads around the three Farm Meadows are also totally unsuitable for any more traffic... They are unlit narrow and without pavements .. There would not be sufficient employment on his site for people to work so people would have to travel by car / walk/ cycle along these unsuitable lanes.

- the stations and schools are at their full capacity .... No room for more cars in railway car parks and the site is further from stations than any other strategic site .

- any bus services will have to face the crowded SRN and his would result in unreliable services and delays

These are just some of the many reasons why this site should not be included in the Local Plan

I have objected many times and yet the Council has failed to remove this Three Farm Meadows Site from the Local Plan even though the council have received thousands of objections from local residents and statutory consultees.

Please listen to us local residents .... It would absolutely ruin the historic village of Ockham ..... 

And please remove this site from the Local Plan .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7447   Respondent: 8917377 / Nick and Fiona Hardman    Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed major development at Ockham (former Wisley Airfield) would have a significant impact on the Horsleys. Whilst there are many arguments against the appropriateness of developing the Wisley Airfield site, our main concern is around the ability of the current transport networks to cope with the increased demand. Their is no rail connection to this site so it is highly likely that commuters would access Horsley and Effingham Junction stations to travel to London by rail. The car parking at these sites is already limited, and the nature of the roads connecting Horsley and Ockham is such that cycling would not be a safe or attractive option for many. The A3 and M25 (at the A3 intersection) would be put under increased strain. Already there are traffic problems on this section of the A3 and the M25 at peak times. Increasing the demand by placing another 2000 homes in close proximity (not to mention those homes proposed for Burnt Common and Gosden Hill Farm, Burpham which will also likely put additional stress on the A3) will make this section of the A3 more congested and less safe.
In addition, the outline planning application for the proposed Wisley Airfield development has recently been refused on the grounds that:

1. a) The proposed development represents inappropriate development of Green Belt Land
2. b) The impact on the Thames Basin Heaths Special Protection Area is a significant concern
3. c) There are concerns about a severe adverse impact on the safe and efficient operation of the strategic road network (A3/M25) and the local road network
4. d) The application fails to deliver transport sustainability measures required
5. e) The applicants have not demonstrated that the proposal would not be detrimental to the viability and vitality of existing district and local centres
6. f) The proposal includes a requirement to build developments up to five storeys in height, which would be in keeping with a dense, urban form of development, and is totally out of keeping with the surrounding area
7. g) There are concerns about the impact on air quality during the construction phase, and how this might be mitigated.
8. h) The impact on policing, education, health and other local services has not been mitigated

Given that nothing has materially changed since this application was refused, that the Green Belt boundaries remain intact and GBC has presented no evidence to justify re-drawing the boundaries, it is non-sensical that this proposal is also included in the local plan.

It is extremely frustrating that these points were raised by many during the consultation process for the local plan in 2014, and yet the current local plan contains the same major flaws. It would seem that GBC is taking no notice of the concerns of residents, and has not made any attempt to explain why it feels that re-drawing Green Belt boundaries is justified, nor to review the clearly incorrect estimates of housing need. We are therefore voicing our strong objection to the Local Plan, which is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/919  Respondent: 8917505 / Colleen & William Heath  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We would like to object to the continued inclusion of this site for possible future residential development.

The prospect of large scale development on this site which is included in the Green Belt and its traffic effect on narrow country lanes, the beautiful village of Ockham, the pressure on school and medical facilities does not bear thinking about. Much smaller scale developments in existing communities is surely the way forward.

Your plan appears to be catering for twice the increase in population that is predicted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/704  Respondent: 8917665 / Frances Porter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the former Wisley airfield being removed from the Green Belt. I strongly support the Green Belt and feel that the large proposals within the local plan for building on the Green Belt is wrong.

I object to the former Wisley airfield being removed from the Green Belt. I strongly support the Green Belt and feel that the large proposals within the local plan for building on the Green Belt is wrong.

I object to Allocation A35.

The council has not long agreed with the vast amount of residents who objected to the latest planning application on the Former Wisley Airfield, for numerous reasons, none of these have changed, WHY IS THIS SITE STILL 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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Comment ID: PSLPS16/2867  Respondent: 8917793 / Alan Pickup  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Allocation A35.

The council has not long agreed with the vast amount of residents who objected to the latest planning application on the Former Wisley Airfield, for numerous reasons, none of these have changed, WHY IS THIS SITE STILL IN THE LOCAL PLAN???

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the district. In the plan, 23% of the houses proposed are in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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.
- I object to the detrimental impact on transport, local roads, and roads. I specifically object to:
  1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  2. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  3. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  4. The increase in the already severe congestion on the Strategic Road Network of the A3 and A25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

- I object to the lack of public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

Flooding across the country last winter clearly demonstrated the danger of overdevelopment and pressure on local drainage systems. I have concerns that building this number of homes, with much high density development, will lead to flood risk in the local area.

The proposed development in the Horsleys and the Three Farms Meadows (the former Wisley Airfield) is unsustainable and will lead to environmental issues both at a local level and in adjoining areas downstream. **Site A39** (land near Horsley railway station, Ockham Road North) has clear flooding issues and nearby drains are unable to manage current levels of runoff – Ockham Road South suffers from flooding through the winter (and autumn and spring!) and the infrastructure is unable to deal with the problem – making it a liability for all – particularly pedestrians and cyclists.

The huge scale of proposed development at Three Farms Meadow will have a huge impact on Ockham, the Horsleys and other surrounding communities. The scale of development will change the nature of these villages irrevocably, creating in effect a new town in a protected green belt area and overwhelming the local amenities, infrastructure and character. The draft Plan has failed to provide substantive evidence of a specific and defined need for large scale high density social housing in the local area.

In conclusion, I strongly object to its proposals as referred to above and believe that the proposed development would seriously detract from the very special character and nature of the green belt, and in particular, the East Horsley Conservation Area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Finally, I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD) this proposal should be rejected for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. There are no “exceptional circumstances” which can justify building on the Green Belt and destroying this area of natural beauty. The Council have sought to misrepresent the site as brownfield – but only 15% of it is developed. The development is unsustainable for all of the reasons outlined above (traffic limitations including on the A3, public transport, high housing density, no proper traffic data. Ockham is a beautiful, very rural village and the proposed development will utterly destroy the village which will be subsumed in a “new town” urban sprawl. The impact of this development on all neighbouring communities cannot be underestimated. The Council have failed to demonstrate any collective impact assessment on the area of this and the proposed Horsley sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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: PSLPS16/2807  Respondent: 8918913 / Sarah Khadka-Lowe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2884  Respondent: 8918913 / Sarah Khadka-Lowe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings
I personally object to the draft Local Plan for the following key reasons:

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. We already are unable to get a seat at Effingham on some busy commuter trains.

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

I object to a plan which proposes that over 70% of new housing be built within the Green Belt.

There is plenty of brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCF).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the increased volume of car traffic that the proposed FWA/TFM development would cause. The proposal of 2,000+ homes would result in an estimated 4,000 additional cars on the roads, most of which would be out and about during the peak period where people are going to and from work and to and from schools. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas would make usage of these roads intolerable and dangerous.

I object to the impact that the proposed FWA/TFM development would have on the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25.

I object to the assumption that there will be suitable public transport to accommodate the proposed FWA/TFM development. The local rail stations of Effingham and Horsley cannot cope with the current numbers of people who regularly use them let alone the increase in passenger traffic and car parking requirements this proposed development will bring. Public transport is already at full capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site and the impact that the proposed FWA/TFM development will have. The site is formally recognized as being part of the Thames Basin Heaths Special Protection Area (SPA) and is designated as a Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). Such designations are not to be taken lightly – they are there to protect the fragile and rare ecosystems that exist. The direct proximity of a substantial development of 2000+ houses and all that entails is not compatible with achieving the objectives of the ecological protection directives.

I object to the fact that the impact that the proposed FWA/TFM development will have on air quality have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is already in excess of EU-permitted levels. Additional traffic will obviously exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the additional acid deposition on the Thames Basin Heaths SPA and the irreversible impact that this will have in terms of permanent habitat degradation.

I object to the fact that the proposed FWA/TFM development 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 access to the countryside and clean air and 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.

I object to the continued inclusion of the FWA/TFM as a potential development site in the Local Plan. A formal planning application has already been unanimously rejected by GBC’s Planning Committee. The continued inclusion of FWA/TFM in the Local Plan is therefore irrational and totally at odds with the wishes of GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency, none of which have seemed to be taken into consideration.

The weight of serious, authoritative evidence against the inclusion of the Former Wisley Airfield (Three Farms Meadows) in the Local Plan is overwhelming. I am dumbfounded at its’ continued inclusion in the Local Plan and the intransigence of GBC in not removing it before the revised Local Plan was re-issued. Given this past track record, future decisions made by GBC will undoubtedly come under serious scrutiny. I trust therefore that GBC will take stock, some logical common sense will prevail, all these objections will be fully and diligently considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I continue to object to the inclusion of policy A35, Three Farms Meadows (formerly, the Former Wisley Airfield), in the proposed Submission Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the draft Plan because of the constraints applicable to this area of Green Belt and nature conservation protected land, and its physical location. I object to its continued inclusion in the Plan.

2. This is Green Belt, high quality, farmland, a nature conservation area in and of itself, and immediately adjacent to an SSSI and SPA. Conservation area Ockham Village, including many listed buildings, borders this area of land.

3. It is surrounded by narrow, winding, weight-restricted, country lanes unsuited to any increase in traffic – let alone the approximately 5000 cars likely to result from a housing development of 2100 houses, or the heavy construction vehicles likely to be needed – over many years – for its construction.

4. It has no infrastructure at all - it is Green Belt, high quality, farmland, and therefore has no gas, water, electricity or sewage connections, and no buildings at all. It is also prone to flooding in parts, making drainage from 2100 houses on concreted over land a particular challenge but one which appears not to have been properly considered.

5. It is remote from railway stations and there is currently no public transport that serves the area, and nor is the area suitable for public transport. These are narrow, winding, weight-restricted country lanes.

6. Local schools, surgeries and railway stations/trains are already full, and there are no obvious local employment opportunities for 2,100 households (assuming 2 adults per dwelling, that equates to 4,200 jobs).

7. It is not clear who would want to live in this new dormitory town, remote from employment, entertainment and any form of infrastructure, where the householders would be entirely dependent on their cars.

8. Housing need - and the figures relied upon by the Council – is anything but transparent, despite requests for information about the basis for the Council’s/its agent’s calculations. Housing “need” is a very different thing from the “demand” for housing in Guildford (or in any other place outside London, but within easy commuting distance of London). Despite this, I understand that adjoining boroughs have made very different (and much lower) assessments of their “housing need”.

9. I understand that Surrey University has long had planning permission to build, on its own campus, sufficient accommodation for all of its students, but that it has failed ever to implement that permission. Why? Surely it should have to do this, thereby freeing up housing stock in Guildford town centre - which clearly does have water, electricity, gas and drainage already in place; already has schools and dentist’s and doctors’ surgeries, already has employment and entertainment opportunities, already has public transport, and for many, already has 2 railway stations within walking distance.

10. Guildford town centre – Walnut Tree Close, for example – already has significant areas of former built/industrial development, again with pre-existing infrastructure in place. Sustainable housing development, in its true sense, should clearly be concentrated here.

11. I object to the quantity of space allocated for retail in Guildford 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 in administration.

12. I object to the fact that the Council has still failed to remove the Three Farms Meadows (site A35) from the Plan despite receiving 1000s of objections to its inclusion - from residents and from statutory consultees.

13. There appears to be no clear justification for the removal of one (other) strategic site from the Plan. Why hasn’t Three Farms Meadows (site A35) been removed? What is the justification for the removal of the other site? Three Farms Meadows (site A35) should now be removed from the Plan.

14. I understand that the Council considers that there should be consultation only on the changes it proposes should be made from the previous version Plan. I object to this. Many people will therefore be discouraged from participating in this consultation, and will not appreciate quite how much has changed from the previous version Plan. Moreover, the complexity and length of reports/documents, many of which are not available in hard copy, further discourages debate and participation in it.
15. I object to the timing of this consultation – yet again in the context of the local plan/proposals in relation to Three Farms Meadows, time limits for submission of comments/objections expire during the school summer holidays – once again limiting debate.

16. I object to the fact that there has been no clear explanation from the Council as to why it thinks it is appropriate to have a (limited) regulation 19 consultation. I believe the proposed changes to the Plan are major.

17. I object to the proposed increase in the size of site A35 (Three Farms Meadows) as this now abuts additional heritage assets, including Upton Farm and Bridge End House, further adversely impacting the setting of these buildings and the wider Ockham Conservation Area.

18. I object to the fact that the proposed increase in site area, being on the south side of site A35 (Three Farms Meadows) and facing (therefore) the Surrey Hills AONB, will increase the negative impact of the views from the AONB.

19. I object to the proposed change of site boundaries to site A35 (Three Farms Meadows). Nor are these identified correctly on the plan (Appendix H p16).

20. I object to the proposed removal of an additional 3.1 ha from the Green Belt that the proposed change of site boundaries to site A35 (Three Farms Meadows) would entail.

21. I object to the change in Green Belt boundary to the eastern end of site A35 (Three Farms Meadows), as this now encloses an area of high archaeological impact.

22. I object to the inclusion in the Plan of site A35 (Three Farms Meadows) as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

23. I object to the extension of the Plan period by 1 year.

24. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

25. I object to the idea – mooted by the Council at one point of this process – that loss of Green Belt land in one part of Guildford Borough could be “compensated” by the re-designation of other land, in another part of the Borough, as Green Belt.

I consider for the reasons listed above and numerous other reasons that this Plan is unsound and not fit for purpose. I urge you now to remove site A35 (Three Farms Meadows) from the local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td><strong>Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2,100 dwellings</strong></td>
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As a resident of Elm Corner, I live directly adjacent to the planned site and have spent the past several years fighting this disproportionate and unfeasible development. My husband and I moved from London to our home in Ockham in order to enjoy open space and to escape the built-up communities that we had previously lived in. We have built a home for our children to enjoy – and also our children’s children. We understand the need for housing – and in particular affordable housing – and we also want the borough to remain a dynamic and growing place to live and work. Both of these goals can be accomplished, however, without the eradication of the protected and very necessary Green Belt. Housing can also be added in areas that will not break an already creaking infrastructure system. As someone who accesses the A3 and the local roads multiple times a day to get to and from my property, I can tell you that a development of this size is simply not sustainable.

Specifically, I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Having lived temporarily in Cobham, I have witnessed firsthand how quickly built-up developments can erode open spaces. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4. 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. As previously mentioned, I moved to Ockham specifically for its rural character. This village can not be allowed to be folded into a new “ready-made” town.

5. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Estimated cycling times to train stations, etc have been significantly underestimated
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.
- 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. I was personally involved in preparing this document and read every residents’ comments regarding their visions for our community
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6882  Respondent: 8919873 / Amy Barklam  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I write to object most strongly to the proposed inclusion of this site in the Local Plan.

- I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- The air quality at Elm Corner is currently at levels that are unacceptable by both UK and EU
- The road infrastructure in and around Ockham and Ripley is insufficient to sustain such a Ripley and Horsley roads are not capable of accommodating such an increase in traffic flow.
- The impact on required public transport for the site is significant and The reliance on cycling for commuters is laughable, the local rail stations do not have sufficient capacity.
- The impact on local environment and ecology would be
- Inclusion in the plan would mean ignoring SPA, SSSI and SNCI
- GBC Planning has already rejected planning proposals for this site
• This site has been repeatedly debated for consideration and repeatedly Continued promotion through the local plan leads many to lose faith in the impartiality and integrity of process within GBC. The reputation of the council is at stake.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/3714 | Respondent: 8919873 / Amy Barklam | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A35 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ) | is Sound? ( ) | is Legally Compliant? ( ) |

Removal of Strategic Site

I object to the fact that there is no justification for the removal of the strategic site at Normandy over and above the removal of any other strategic site, and in particular site A35 – most notably on the grounds of sustainability.

Continued Inclusion of Site A35

I object to the fact that the Council has failed to remove Site A35 from the Local Plan despite the receipt of thousands of objections from local residents and statutory consultees.

I object to the inclusion of Site A35 in spite of unanimous rejection of planning application 15/P/00012 on fourteen separate grounds.

I object to the inclusion of Site A35 because it is the least sustainable strategic site identified both in this version and previous versions due to the constraints of the site and its physical location. From a transport perspective, it is further from railway stations than any other identified strategic site. When you do reach them, the closest stations have unsolvable capacity and parking issues.

I object to the inclusion of Site A35 because it is adjacent to the most congested stretch of strategic road network in the county (A3) and is very close to one of the most congested junctions in the country (J10). Traffic will only be exacerbated by anticipated increased visitor numbers (500,000) at the adjacent RHS Wisley – the impact of which has not yet been taken into account.

I object to the inclusion of Site A35 because the local road network is not sustainable for the increase in cars – and certainly not for the increases in buses and larger vehicles that will be coming to and from the site.

I object to the inclusion of Site A35 because it remains unclear when/if the Ockham DVOR/DME will be decommissioned. This constrains the site significantly.

I object to the removal of an additional 3.1 hectares of land relating to Site A35 from the Green Belt without justification.

I object to the increased area of Site A35 as this now abuts additional heritage assets, including Upton Farm and Bridge End House (in addition to the known impact on Yarne), negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that Site A35 will not contribute to the 5-year housing requirement due to constraints, most notably in the provision of sewerage capacity, but also due to other infrastructure constraints already mentioned.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1877  Respondent: 8920033 / Jane Barnwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to the removal of the Three Farm Meadows (TFM) from the Green Belt. The site serves a vital role in protecting the area against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
2. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4. I object to the grossly disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to TFM, an area that at present has only 0.3% of the population of GBC).
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.
6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. In fact to encourage cycling and walking to and from this development is irresponsible as the local roads are too narrow with no footpaths of street lights. There is a real risk of fatal accidents.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
I wish to register my strong objection to the continued inclusion of policy A35, Three Farm Meadows in the draft local plan for the following reasons:

1. The local roads cannot sustain more traffic. The A3 and M25 junction is incredibly congested at all times of the day and the country roads are already very dangerous, there have been at least two accidents at the crossroads between Old Lane and Ockham Lane in the last few months.  
2. The roads are not wide enough for the new suggested bus routes  
3. Walking and cycling this is unbelievably dangerous due to the narrow twisting roads  
4. There is currently insufficient parking at the local stations, and the addition of so many new residents will make the situation a lot worse  
5. I object to removing more land from the green belt, especially without any justification  
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should not be permitted in flood zone 2 and 3  
7. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.  
8. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

In summary I consider the draft local plan to be unfit for purpose.
Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

This proposed development is contrary to the existing Metropolitan Green Belt policy and is only possible with the proposal contained in paragraph 4.3.17 to remove Wisley Airfield from the Green Belt.

It will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to one of the most picturesque areas of the country.

Therefore, I strongly OBJECT to Policy A35

In conclusion, I would urge GBC to not to seek to develop housing in land that is currently within the Metropolitan Green Belt and to respect the wishes of the over whelming majority of the residents of those villages which GBC seeks to inset from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. **Recent data confirms that ONS growth figures should have been used and these have been ignored.** The recent referendum result will also slow the population growth and this needs to be considered by the GBC.

3) I object to the disproportionate allocation of housing in the north of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which **65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC**).

4) 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.

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) 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.

9) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Limited’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

I also hope that the borough’s housing needs are considered in relation to the effect the Brexit vote will have on population growth ie the consensus is that immigration rates will decrease and therefore the demand for housing will also decrease.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4152  Respondent: 8920865 / Glen Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In relation to the specific allocation of site A35, I have a number of objections as outlined below:

1. I object to the inclusion of site A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of infrastructure and in particularly the sewerage constraint due to lack of any spare capacity at Ripley sewerage works.

2. I object to the fact that the Council appear to have directed that the transport assessment for site A35 uses prescribed vehicle movements from site with no justification. I believe this makes the transport evidence subject to challenge due to bias on behalf of the Council.

3. I object to the inclusion of site A35 as it is the least sustainable site identified in both this version and previous versions of the plan because of the constraints of the site and the physical location which is adjacent to the TBHSPA.

4. I object to this site due to the fact that it is further from the railway stations than any other strategic site and that the nearest stations have unsolvable capacity and parking issues.

5. I object to the inclusion of site A35 in spite of unanimous rejection of planning application 15/P/00012 on 14 grounds.

6. I object to the inclusion of site due to the fact that it is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10). The SRN in this location is currently operating significantly over-capacity and the proposed improvements both uncertain in design and timescale. Even with Highways improvements proposed without the impact of this development it is accepted that the A3 is at full capacity and so cannot take the additional traffic from this proposed development.

7. I object to this site due to the fact that the local road network is also at capacity and is severely adversely affected when the SRN is not free-flowing at times of accidents, diversion, roadworks etc.

8. I object to the allegation that public transport provision will be able to mitigate the impact of this allocation especially as bus routes to/from Guildford will have to utilise the over-crowded SRN in one/both directions and therefore will be unreliable and subject to frequent delays.

9. I object to the inclusion of site A35 due to the fact that any public transport (bus services) provision to Horsley and/or Effingham junction will impact the safety of the local road network as the lanes are not legally wide enough to accommodate PSVs, particularly when sustainable methods of travel such as cycling and walking are being promoted on the same lanes at the same time. This is not only unrealistic but it is also unsafe.

10. I object to the allocation of site A35 due to the fact that the mitigation to address the impact of increased traffic will not address the commuters travelling to Woking station.

11. I object that due to the fact that site A35 is adjacent to the most popular tourist attraction in the south-east, the RHS at Wisley where the visitor numbers are due to increase by 500,000 visitors per annum and that the associated traffic increase has not been properly modelled or taken into account; and
12. I object to the fact that nor has any account been taken of the traffic resulting from the regular events at the RHS which attract 1000’s more visitors several times a year in the consideration of the allocation of site A35.

13. I object to the fact that the inclusion of site A35 has not properly taken into account the impact of the changed boundaries of the allocation on the adjoining heritage assets and in general and in particular the impact on the setting of Bridge End House (Grade II) and Upton Farm (Grade II) in addition to the known impact on Yarne.

14. I object to the dismissal of the substantial or less than substantial negative impact on the setting of the Grade 2 listed property Yarne. The requirement is to go through a process supported by statute and is to be given a ‘heavy weighting’ when considering the balance of harm versus benefits of development. As this is enshrined in statute law it is not legal to ignore these effects on Yarne and surrounding historic sites.

15. I object to the fact that the increased allocation at site A35, being on the south of the site facing the Surrey Hill AONB will further negatively impact the views to and from the AONB.

16. I object to the removal of an additional 3.1ha of land from the green belt without any justification.

17. Furthermore, I object to change of the site boundaries of allocation A35 as these are not identified clearly or correctly on the plan (Appendix H p16).

18. I object to the unjustified change in the green belt boundary at the eastern end of the site especially as this now encloses an area of high archaeological interest which will prove difficult to develop in the light of the archaeological finds in the surrounding area.

19. I object to the fact that the impact of the OCK/DVOR has not been properly taken into account in the allocation of site A35. It remains unclear when/if this will be decommissioned as the timetable has already slipped. The constraints on the site due to the DVOR are significant and if it is not decommissioned will severely limit the availability of the site to deliver enough land to make the allocation viable.

20. I object to the fact that insufficient weight has been given to the sustainability of allocation A35 due to the lack of employment available onsite meaning that almost all residents will have to travel to work. As already identified above it is unrealistic and unsafe to assume people will walk/cycle to work on narrow unlit local roads on anything more than a very occasional basis.

21. I note that the changes in the opportunities listed in site allocation A35 reinforce why this site is totally inappropriate, talking of “good urban design” – just what is needed in a rural area.

22. I object because of the impact on the TBH SPA of A35 to the mitigation strategy proposed concerning use and calculation of the SANG and considering the appointment of a warden to solve the issue of inhabitants and cats being drawn down the rights of way and into the sensitive TBH SPA. The mitigation strategy proposed is inadequate.

23. I object to the undercalculation of SANGS and the failure to recognise the flooding of the southern area designated as SANGS thereby meaning there is inadequate SANGS to protect the TBHSPA.

24. I object on the same grounds as RSPB to the negative and inadequately mitigated impact on the SSSI, SNCI and TBHSPA.

25. I object to the fact that site A35 will not meet any of the 5 year housing requirement and is subject to so many exigencies and infrastructure costs it cannot be an exceptional circumstance to include it in the Plan which thereby removes the site from greenbelt.

For all the reasons already identified by the Wisley Action Group together with the reasons listed above it is quite clear that site allocation A35 is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the impact of Guildford Borough Council Draft Local Plan on Heritage sites and Conservation Areas in Ockham

Despite its relatively close proximity to London and nearby towns Ockham has escaped suburbanisation. It has retained its distinct rural heritage and has not been subsumed within much larger conurbations. It remains a rural parish and retains its identity as an evolution of a collection of medieval hamlets where small houses nestle together in settlements with their own distinct character. The foundation of the local economy remains agricultural based around arable and livestock farming, equine recreation and game bird rearing.

The special character of the built environment in Ockham is acknowledged by the fact that 29 buildings have been listed by English Heritage. Many of the listed buildings are farm houses by origin. Their setting was and remains rural and agricultural. Upton Farm and Yarne are both 15th century farmhouses immediately adjacent to Three Farms Meadow and have views over it. Appstree and Bridge End have land adjoining Three Farms Meadow. The development of high density housing at Three Farms Meadow will cause irreparable damage to the setting of the listed buildings in Ockham and to the Ockham Conservation Area. The development, because of its location on the highest point of the hill and down the south side of the proposed site will overlook the Conservation Area and impact the setting of those precious and ancient buildings in the Ockham Conservation area causing substantial impact. The effect on the distinctive local Lovelace style would be wholly inappropriate.

The particular significance of the Three Farms Meadows is that it creates a meaningful green gap which enriches and strengthens the separate identities of the different settlements of Ockham. Consequently the separation provided by the green gap is a significant asset to both conservation areas and contributes to their character as distinctively separate settlements. The most significant harm caused by the development proposals is that the scale of development overwhelms the historic settlements of Ockham which are quintessentially small in scale and historic in nature. Unlike many ‘commuter belt’ villages these settlements have escaped extensive redeveloped or extensive post-war expansion. Consequently they retain their evolved medieval form as well as most of their rural separation and setting. These are the characteristics which make them special and gave rise to the designations of Bridge End, Church End and Ockham Mill as a conservation areas.

The disproportionate scale of development in the appeal proposals is contrary to the natural evolution and growth which gave rise to the character of Ockham over the last 500 years. The result will be a revolutionary change in the shape and morphology of the Parish settlements which cannot fail to harm their distinct character.

The historic parish currently consists of 163 dwellings. The addition of another 2,100 dwellings a greater than tenfold increase, will irreversibly change the way in which the historic settlements of Ockham areas perceived. Perception will no longer be of an evolved medieval parish in rural surroundings but of a much larger modern suburb with an historic periphery.

Development on this scale has never occurred within the Parish of Ockham or in Lovelace Ward and, even if well designed, cannot assimilate well into the fine grain and historic parameters of the parish settlements. The development fails to respond to the significance of Ockham’s listed buildings, its conservation area or wider setting in any positive way.

NPPF paragraph 137 states that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.’

Sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to preserving listed buildings or their settings and section 72 requires special attention to be paid to preserving or enhancing the character or appearance of conservation areas.

Justice Linblom stated that ‘…a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one.’ As such heritage conservation is to be given considerable weight and importance in the planning balance.

The proposal for the building of in excess of 2000 houses on the former Wisley airfield no way accords with any planning framework. More importantly it fails to meet statutory requirements and the substantial damage to historic
heritage properties and the Ockham Conservation Area cannot be adequately mitigated. As such I strongly object to the inclusion in the Draft Local Plan of this site A35 (FWA) and it should be entirely removed from the GBC Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5222  Respondent: 8920865 / Glen Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

XV. I object to the fact that no account appears to have been taken on the impact of pollution on the TBHSPA particularly the damage caused by nitrogen deposition. This will also impact RHS Wisley. It is an undeniable fact that the level of growth proposed by this plan will result in increased traffic movements and by extension increased polluting emissions. Any argument that relies on potential changes to the make-up of the vehicle fleet in terms of fuel source is clearly premature.

XVI. I object to the fact that there is no consideration of the impact of in-combination development on the TBHSPA especially the large proposed developments in neighbouring authorities.

XVII. I object to the fact that there is no justification for the removal of the strategic site at Normandy over and above the removal of any other strategic site and in particular site A35 on many grounds but most notably on sustainability grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5405  Respondent: 8920865 / Glen Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the impact of Guildford Borough Council Draft Local Plan on Heritage sites and Conservation Areas in Ockham Despite its relatively close proximity to London and nearby towns Ockham has escaped suburbanisation. It has retained its distinct rural heritage and has not been subsumed within much larger conurbations. It remains a rural parish and retains its identity as an evolution of a collection of medieval hamlets where small houses nestle together in settlements with their own distinct character. The foundation of the local economy remains agricultural based around arable and livestock farming, equine recreation and game bird rearing. The special character of the built environment in Ockham is acknowledged by the fact that 29 buildings have been listed by English Heritage. Many of the listed buildings are farm houses by origin. Their setting was and remains rural and agricultural. Upton Farm and Yarne are both 15th century farmhouses immediately adjacent to Three Farms Meadow and have views over it. Appstree and Bridge End have land adjoining Three Farms Meadow. The development of high density housing at Three Farms Meadow will cause irreparable damage to the setting of the listed buildings in Ockham and to the Ockham Conservation Area. The development, because of its location on the highest point of the hill and down the south side of the proposed site will overlook the Conservation Area and impact the setting of those precious and ancient buildings in the Ockham
Conservation area causing substantial impact. The effect on the distinctive local Lovelace style would be wholly inappropriate.

The particular significance of the Three Farms Meadows is that it creates a meaningful green gap which enriches and strengthens the separate identities of the different settlements of Ockham. Consequently the separation provided by the green gap is a significant asset to both conservation areas and contributes to their character as distinctly separate settlements. The most significant harm caused by the development proposals is that the scale of development overwhims the historic settlements of Ockham which are quintessentially small in scale and historic in nature. Unlike many ‘commuter belt’ villages these settlements have escaped extensive redeveloped or extensive post-war expansion. Consequently they retain their evolved medieval form as well as most of their rural separation and setting. These are the characteristics which make them special and gave rise to the designations of Bridge End, Church End and Ockham Mill as conservation areas. The disproportionate scale of development in the appeal proposals is contrary to the natural evolution and growth which gave rise to the character of Ockham over the last 500 years. The result will be a revolutionary change in the shape and morphology of the Parish settlements which cannot fail to harm their distinct character.

The historic parish currently consists of 163 dwellings. The addition of another 2,100 dwellings a greater than tenfold increase, will irreversibly change the way in which the historic settlements of Ockham areas perceived. Perception will no longer be of an evolved medieval parish in rural surroundings but of a much larger modern suburb with an historic periphery. Development on this scale has never occurred within the Parish of Ockham or in Lovelace Ward and, even if well designed, cannot assimilate well into the fine grain and historic parameters of the parish settlements. The development fails to respond to the significance of Ockham’s listed buildings, its conservation area or wider setting in any positive way. NPPF paragraph 137 states that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.’ Sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to preserving listed buildings or their settings and section 72 requires special attention to be paid to preserving or enhancing the character or appearance of conservation areas. Justice Linblom stated that ‘….a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one.’ As such heritage conservation is to be given considerable weight and importance in the planning balance.

The proposal for the building of in excess of 2000 houses on the former Wisley airfield no way accords with any planning framework. More importantly it fails to meet statutory requirements and the substantial damage to historic heritage properties and the Ockham Conservation Area cannot be adequately mitigated. As such I strongly object to the inclusion in the Draft Local Plan of this site A35 (FWA) and it should be entirely removed from the GBC Draft Local Plan.

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?

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<td>I object strongly to the re-instatement of the plan to build on the Wisley airfield site. This has already been rejected once for sound reasons: the impact of the proposed number of houses within the Green Belt is unacceptable regardless of the developer adding schools or shops to the design. The impact on the A3 transport route is unavoidable. Putting this proposal back into the plan shows a disgraceful lack of integrity by those within the Council who invite public input to the planning process and then show total disregard for the views of people who take part in the consultation.</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: PSLPS16/2423</th>
<th>Respondent: 8922561 / Adam Wein</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I would like to register my objection to the new local plan for the Horsleys and Wisley. At a time when the environment is under pressure in so many ways , it seems to me ridiculous that you are looking to take areas out of the Green Belt - and increase the urbanisation of the countryside. As a country we expect the rest of the world to contribute to green policies, but unless we can demonstrate such policies close to home then we are in no position to talk. On top of this, the infrastructure in the area does not support a significant increase in the local population size. And again, the increasing of the infrastructure will place greater burden on the environment with more/larger roads, greater use of natural resources, water, sewerage, etc. Whilst I do appreciate that the population size is growing in the UK, requiring extra accommodation, evidence suggests that this can be provided at brown-field sites and policies to encourage higher occupancy rates.</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: PSLPS16/3846 | Respondent: 8922657 / Stephanie Brown | Agent: |
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. The geography of London is unique specifically because of the existence of the Green Belt; if not for the Green Belt London would sprawl uncontrollably like so many other cities in the world.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. I use the M25 every day and the A3/M25 junction is already a bottleneck without an additional 4000 cars joining at the Wisley junction.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent: 8923777 / Andrew Mitchell</th>
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<tr>
<td>I also object to the proposed development at Wisley and Gosden Hill farm. The proposed developments are too great for the road infrastructure and would cause an urban sprawl that would link Guildford and the villages to the inside of the M25</td>
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<th>Respondent: 8923969 / Stephen Newt</th>
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I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the disproportionate allocation of housing in this specific part of the borough. Indeed over 23% of the Plan's new housing is proposed in the immediate localities my home in Ockham, together with Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that currently only has 0.3% of the population of GBC).

4) I object to the massive 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 dwellings (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2000+ dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

5) I object to the very seriously detrimental impact on the local infrastructure which in my view will be massively overwhelmed by the Plan. Roads, stations, schools to name but a few are completely inadequate to cope with the projected increase in demand.

6) I object to the fact that the proposed Plan does not meet the stated needs and desires of local communities, as evidenced in the Ockham Parish Plan. We local residents enjoy living in Ockham because of access to countryside and clean air as well as peace and quiet afforded by wide open spaces. Over 90% of residents want both the historic features of the village maintained and our village's green spaces, including the FWA/TFM, protected.

7) I object to the continued inclusion of a site (the former Wisley Airfield - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/5803</th>
<th>Respondent: 8924161 / Peter &amp; Victoria Luckham-Jones</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

Please record this as my objection to the draft Local Plan for the below reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

The site is the least sustainable which has been identified in both this version and in previous versions of the plan because of the constraints on the site and its physical location.

The distance from rail stations is not acceptable.

The site is next to one the most congested junction in the country (J10)

Our local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

In relation to public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Bus services etc to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

RHS at Wisley is immediately next door where visitor numbers will increase by 500,000/annum.

The associated traffic increase from the RHS has not been taken into account.

The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6884  **Respondent:** 8924385 / Jenni Mansel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the National Planning Policy Framework, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the continued inclusion of the Former Wisley Airfield since after 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns noted below. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to a plan that 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.

6) I object to a plan that will have a detrimental impact on transport, local roads and road safety, specifically in relation to the development of the Former Wisley Airfield:

   1. The assertion that will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECTION to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings.

We live in Cobham and we have a greater interest in what goes into the Guildford Local Plan for the local area than those living on the far side of the borough.

On the 8th April 2016, we watched on video cam, application 15/P/00012 being rejected unanimously on the recommendation of Planning Officers. The Planning Report identified serious concerns about the development of this site. We are now aghast that this settlement is still being considered.

We also object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

The increase in population at Wisley and the nearby localities would put an intolerable strain on local road and rail networks which are already overstretched. During the rush hour it is tricky getting a space in the station car parks and difficult to secure a seat on the train (40 minutes standing to Waterloo from Cobham - a terrible start to the day). Long queues of traffic are an everyday occurrence in and around Cobham, particularly during the rush hour.

Moreover, Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving serving 5,000 additional occupiers at the site and would experience a significant increase in traffic.

Furthermore, we think that the proposed housing density is completely out of keeping with the surrounding rural area and we understand that the air quality around the Royal Horticultural Society gardens and the Thames Basin Heath Special Protection Area is already in excess of legal limits. It will not improve if the proposed development is allowed.

We could go on and on but a key point is that green belt boundaries can only be changed in exceptional circumstances. There are no exceptional circumstances.

Please remove Wisley Airfield from the local plan and reconsider the disproportionate allocation to Ockham, Ripley, the Horsleys and Effingham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2123  Respondent: 8925153 / D B Saidman  Agent:

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5862  Respondent: 8925569 / Gaynor Donnell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Ockham Airfield - This was declined by your local planners yet is included again in the plan. The roads around Wiley are far too small and the A3 /M25 junction must be one of the worst on M25 and cannot take more traffic. This proposed development is totally mad and driven by money and nothing else.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3675  Respondent: 8926529 / Annie Cross  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy A35 – Wisley

1. I object: to this site being expanded from 92.8 ha to 95.9 and the proposal to remove it from the Green Belt, as this provides the possibility of large scale development on an unsustainable site which is the only site in the draft Plan situated in the centre of Metropolitan Green Belt - all the other large Green Belt sites proposed are adjacent to urban/residential areas.

2. I object: to GBC removing this location from the Green Belt as their own description of the site is “former airfield and fields” and “partially previously developed land” and only 17ha of the site is truly brownfield.

3. I object: to this amendment as it directly contravenes NPPF Section 9, para 7 “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” and NPPF, Section 9, para 80, “to assist in safeguarding the countryside from encroachment

4. I object: to the above expansion of the site contravening another of the five purposes of the NPPF, Section 9, para 80 “to prevent neighbouring towns merging into one another”. The site is in the middle of the Metropolitan and surrounded by towns and villages, all approximately 1.5-2.5 distant, including railway stations. It is inevitable that some of these towns will eventually merge with this site.

5. I object: to the GBC section ‘Requirements: Infrastructure, (3) (d), mitigation schemes “on rural roads surrounding the site”’. Other than the nearby A3/M25, the surrounding country roads are narrow and winding, have no pavements and no lighting. It will be possible to walk/cycle to Ripley, (the nearest village approximately 1 mile from the nearest point of the site), in daylight along a semi-wooded path without lighting and assuming there is no need to carry shopping bags back to the site. There are cycle lanes to Ripley, but the A247 is a busy road with traffic having just left the A3 and not yet in “30 mph” mode. I have never seen anyone cycle this route. I therefore object to vague “mitigation” statements on an expanded site.

6. I object: to the GBC section ‘Requirements: Infrastructure, (4). “The identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management”. The proposed Burnt Common slip roads will mean much of the traffic travelling to/from the south to site A35 will travel through Ripley. This does not “mitigate”, it adds considerably to the current problem of heavy congestion through Ripley. If two slip roads are to be added to service site A35, they should be located at the A3 Ockham roundabout, situated next to the site.

7. I object: to GBC section ‘Requirements: Infrastructure, (22). “Sensitive design as site boundaries that has significant regard to the transition from village to greenfield”. 2,500 homes, i.e. 5,000+ people and similar number of cars, is not a village, it is a town and the transition from “village to greenfield” is in fact transition from “new town” to Green Belt.

28a I object: to GBC not applying constraints to Wisley Airfield (Site 35) and refusing to acknowledge this is an unsustainable site, further away from a railway station than any other site proposed, meaning car usage will be a necessity, contributing to air quality and light pollution problems.
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/5988</th>
<th>Respondent:</th>
<th>8926561 / Lindy Bomford</th>
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<td>The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous. The plan also includes extensive and inappropriate developments at Burnt Common (400 houses &amp; commercial developments) and Gosden Hill Farm, Burpham (2000 houses &amp; mixed use developments).</td>
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<td>11) I OBJECT to the inclusion in the Plan of the site at Wisley, which has already been roundly rejected by GBC’s Planning Committee.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Respondent:</th>
<th>8927073 / Jane E Tarbuck</th>
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I write to register my objection to the new Guildford Borough Council New Local Plan 2016. I also attach the same response as a Word Document in case of any formatting problems with this text.

Firstly, I strongly disagree with removing the Horsleys from the Green Belt. They are both very rural villages surrounded by open land and woodland, where existing roads were laid out to complement the environment, taking in the proximity of Ranmore Common and the nearby Surrey Hills Area of Outstanding Natural Beauty on one side and Wisley and Ockham Commons on the other. Of particular significance are the areas of heathland and woodland at Wisley and Ockham Commons which provide a much needed refuge from the nearby A3 and M25 and it also happens that the lowland heathland in this area is a very scarce habitat and supports a specific and unusual range of wildlife, with three areas designated Sites of Special Scientific Interest by Natural England in recognition of their importance for nature conservation, and are also part of a European Special Protection Area. This therefore makes the proposed development at Wisley Airfield unacceptable in terms of the environmental damage that would have to occur in order to sustain a development of this size. I therefore urge you to reconsider your plans for Wisley with these factors in mind.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8927841 / Tom Bomford</th>
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<th>Respondent: 8927873 / Colin Brewer</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to the draft Local Plan for the following key reasons:</td>
<td>• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.</td>
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• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public service. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will
mean *either* major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/5885  **Respondent:** 8927905 / Jacqueline M Fish  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Wisley Airfield Policy

I OBJECT to the inclusion of Wisley Airfield development in the local plan. No exceptional circumstances have been demonstrated for its removal from the Green Belt. This proposal has also been unanimously rejected by GBC’s planning committee because of grave concerns including traffic congestion, air pollution, lack of suitable public transport, unsustainability, the inappropriateness of an urban style development in this rural area, the major impact on local villages. These are all still relevant objections.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/7678  **Respondent:** 8927905 / Jacqueline M Fish  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Wisley Airfield Policy A35

I OBJECT to the inclusion of Wisley Airfield development in the local plan. No exceptional circumstances have been demonstrated for its removal from the Green Belt. This proposal has also been unanimously rejected by GBC’s planning committee because of grave concerns including traffic congestion, air pollution, lack of suitable public transport, unsustainability, the inappropriateness of an urban style development in this rural area, the major impact on local villages. These are all still relevant objections.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPS16/2569  Respondent: 8928161 / Jan Brophy  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 continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and Allocations A35, A36, A37, A38, A39, A40 and 41 are removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6148  Respondent: 8928481 / Margie Cox  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECTIONS TO GUILDFORD BOROUGH COUNCIL PROPOSED LOCAL PLAN (JUNE 2016) AND TO THE CONTINUED INCLUSION IN THE PLAN OF THE FORMER WISLEY AIRFIELD (FWA), NOW KNOWN AS THREE FARMS MEADOWS: ALLOCATION A35 FOR THE PHASED DEVELOPMENT OF A NEW SETTLEMENT OF UP TO 2,100 DWELLINGS

I object to the draft Local Plan for the following reasons:

1) I object to the proposal that over 70 percent of new housing required in the plan be built within the Green Belt. There are many opportunities to regenerate brownfield land in urban areas, which already provide the required infrastructure for larger communities.

2) I object to the fact that the proposed plan goes against the wishes of local communities. We have chosen to live in this area because we appreciate access to the countryside (with clean air) and the peace and quiet provided through open spaces. Building extensively on Green Belt land will create an urban corridor stretching from London to Guildford and compound air pollution problems.

3) I object to the disproportionate allocation of housing in this particular part of the borough. Over 23 percent of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3 percent of the population of GBC).

4) I object in particular to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.

This will result in a development with an excess of 2,000 dwellings, with urban-style buildings of up to five stories high and an unsupportable increase in population density. This is totally out of character with the surrounding villages.
5) I object to the development of the Former Wisley Airfield (FWA/TFM) Site because of the adverse impact it would have on local roads and road safety. A proposed development of 2,000 plus homes would result in an estimated 4,000 additional cars. We already have severe congestion on the Strategic Road Network of the A3 and M25. Trains servicing Horsley and Effingham Stations are already seriously overcrowded.

6) I object to the assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated and too spread out to anticipate a reduced reliance on private cars. The lack of cycling lanes and the lack of pedestrian footpaths (and the space to provide them) would impact on the safety of local residents.

7) I STRONGLY OBJECT to the continued inclusion of the Former Wisley Airfield (FWA/TFM), where the planning application has already been unanimously rejected by GBC’s Planning Committee. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

For all of these reasons, I trust that the objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35 is permanently removed from the Local Plan with immediate effect.

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? ( )

Thank you for your notification on Strategy and Sites (2017) Consultations regarding the proposed Submission of the Local Plan.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons, including:-

1. The surrounding road infrastructure does cannot support a development of this size.

2. Local roads in the vicinity of the site are narrow and are already at capacity. They are also unable to support proposed bus services.

3. The site is adjacent to the most congested stretch of strategic road network in Surrey and Junction 10 is often backed up.

4. The site is also opposite Wisley Gardens, a very popular visitor destination. The impact of 500,000 plus visiting cars per annum has not been taken into account.

5. The site is further away from a railway station than any other identified site.

6. Neither Horsley Station nor Effingham Station have additional parking capacity.

7. It is unrealistic to promote cycling and walking together with public transport (bus) services at the same time, as local lanes are already too narrow to safely support both cars and cyclists.

8. There are not enough employment opportunities proposed onsite for the large number of residents living in the proposed 2,600 homes. They will therefore add to congestion on the roads and lanes.

9. The changed ‘opportunities’ listed in this policy reinforce why this site is totally inappropriate talking of ‘good urban design’.
10. Opportunity (3) should be common to all sites and is not unique to this site.

11. I OBJECT to the increased area of the site. This now extends to additional heritage assess and negatively impacts the setting of the wider Ockham Conservation Area.

12. I OBJECT to the change of site boundaries as these are not identified correctly on the plan (Appendix H, p16).

13. I also OBJECT to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

14. I OBJECT to the removal of additional 3.1 ha from the green belt without any justification.

15. I OBJECT to paragraph 21 which ‘limits’ development in flood zones 2 and 3. Development should be EXCLUDED in any flood zone.

16. I also OBJECT to paragraph 22 as this does not reflect the impact of the buildings on the surrounding areas.

17. I OBJECT to the housing number and the fact that the Council have not, as required used any constraints such as green belt, infrastructure air quality, AONB, TBHSPA etc.

18. I OBJECT to policy S2 where it states ‘the figures set out in the Annual Housing Target table sum to a total of 12,426’ yet the figures in the table add up to 9,810 - what is the significance of the missing 2,616?...?

19. I OBJECT to the quantity of space allocated for retail in the town centre, in particular to the reliance on the Carter Jonas study update (2017) which includes ‘demand’ for retail space from companies already in administration. I have also noticed that a number of business in Horsley Village have moved or closed down.

20. I OBJECT to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

21. There has been no clear explanation why the Council think it is appropriate to have a regulation 19 Consultation when the changes are major.

22. I OBJECT to the fact that the Council has failed to remove this site from the local plan, despite receiving 1,000’s of objections from local residents and statutory consultees.

23. It is clear that the Council has failed to take on board many of the comments made in the past about issues such as poor drafting, errors. Etc.

24. It is also clear that when comparing the allocated sites, the Council have been extremely inconsistent placing different weight on the various restrictions.

25. I OBJECT to the Council wasting tax payers and residents time and money not following due process and indeed ignoring previous representations.

I require confirmation that ALL of these comments, together with all my previous comments are passed to the Inspector. I consider for the reasons listed above, as well as numerous other factors that this plan is unsound and not fit for purpose.

**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? ( )

Three Farms Meadows - Wisley Airfield

I strongly object to any development at Wisley Airfield for two reasons – firstly inappropriate development of the area (clearly agreed by all of the Borough Councillors when they rejected the development on 14 counts) and also its effect on the AONB to the south.

The current proposals would mean an increase in population of an estimated 5,355 people. Ockham, a small hamlet of ancient houses would be subsumed into a mass of housing – like Milton Keynes. The land is predominantly productive arable farm land (only 17% is hard standing). The area (hardstanding) near Elm Corner is already in the Special Protection Area bordering on the Thames Basin Heathland. There is a 400m zone where development is prohibited, and from 400m out to 5km developments require a SANG.

It is estimated that on a development of this size there would be 700 dogs and a similar number of cats. Residents would not use another SANG for walking their dogs, they would head straight for Wisley Common over the designated green space thus doing ever more damage to a nationally important area of conservation. At the moment the birdlife on the farm/airfield is wonderful. The song of the skylark is present all year round – but certainly not for long if 700 cats took up residence. The developers have stated that they would have a permanent dog warden working to prevent this happening. Do you really trust this and from 6am to 10pm when it would be necessary?

The proposed changes to the road systems around the site are awful and not only would it seriously increase volumes of traffic throughout the surrounding area, the whole character of the area would be changed for the worse forever. The effects on the surrounding villages would be devastating. The nearest stations of Horsley and Effingham Junction already have overfull car parks – what would happen here? Shopper’s parking is just adequate now in East Horsley and Ripley – where would these new visitors park for shopping etc?

Infrastructure: The developers have stated that they will not build any facilities (schools, doctors surgeries, shopping area) until 500 houses have been built – some ten years into the project. What will people use in the meantime – especially if all other local housing is built within five years as stated?

Transport links. The developers have stated that to address sustainability that there would be a bus service every ten minutes to Effingham station. Can you seriously think this would carry on at their expense in perpetuity from 6 am to midnight? The developers also calmly told me at their public meeting that they fully expected all residents to walk or cycle everywhere. My answer to that was “dream on”. I am a keen cyclist and meet many people who are astounded when they realise that I cycle more than a couple of miles let alone 20 at one go. Can you imagine hordes of cyclists or pedestrians fighting their way down Old Lane or Ockham Road to the respective stations at morning rush hour? As an experienced cyclist I avoid those lanes even during less busy times because of the narrowness of the road and speed of traffic. People drive to our local station from less than ¾ mile away every day and certainly wouldn’t choose to walk or cycle the 2.5 miles. According to Google Maps this is a 9 minute cycle ride and a 49 minute walk. Need I say more? This is an opportunity for the landowners to make a fortune with no thought whatsoever to the sustainability of the plan.

If having promised to build various essential infrastructure projects upon completion of 500 dwellings, what would Guildford Borough Council do if at 499 dwellings the developers decided to pause in their building plan for a few years? What if they decided never to go beyond 499 houses as demand wasn’t satisfied? Is all this a horrible mistake in the making? I have been told that this habit of building to just under a specified total to avoid expensive infrastructure projects is not uncommon.

Effect on the AONB to the south of the site

I visited two of the highest points in the AONB to the south of the site to see whether I could see the site from the AONB (Polesden Lacy and the high point of Staple Lane – a magnificent viewpoint to the south of the A246). From both locations I identified where Wisley Airfield was using triangulation and OS maps. I couldn’t actually any of the site - just green and trees in the general area. I suspect it could be seen on the years when the farmer planted a crop oilseed rape as the yellow splash of colour would stand out. I could just about identify traffic on the A3 passing nearby the site. However there was no doubt that it would be extremely visible with housing let alone 5 storey buildings on it.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/74  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY A35: Land at former Wisley Airfield

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

EHPC has major concerns about this proposed development and has objected against prior planning applications at this location. We consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

EHPC strongly OBJECTS to Policy A35 and will provide a more detailed submission outlining our arguments against this policy in a separate letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/584  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham

This letter supplements our submission of 13th June 2016 concerning the Proposed Submission Local Plan and provides additional comments on Site Policy A35, ‘land at former Wisley Airfield, Ockham’.

East Horsley Parish Council (“EHPC”) strongly OBJECTS to this proposed policy for the reasons detailed in this letter.

a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: It has not been demonstrated that the benefits of the
Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers’ previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon ‘exceptional circumstances’, which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

Accordingly, we OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.

b/ This site does not meet acceptable levels of sustainability

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC’s consultant, AECOM, is presented in the Local Plan Evidence Base report ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional ‘traffic light’ system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as ‘Red’ by AECOM for this site, more than any other large site.

Detailed reasons why this site has such poor sustainability include the following:

• There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

• New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

• There are presently no schools, medical services or shops within walking distance of this site;

• There is presently no local employment at this site and little after the development is completed;

• There will be a significant destruction of agricultural land arising from this development;

• There will be significant environmental damage from this development;

• There is no public transport currently serving this location;

• The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity availab

• Travel from this site will be primarily dependent upon motor vehi Any new site so dependent upon motor vehicles for transport cannot be considered as being ‘sustainable’;

• New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;
Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC’s own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

**Accordingly, we OBJECT to Policy A35 on grounds of its unacceptable sustainability.**

**C) The site will have a severe impact on local traffic & infrastructure:**

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley’s two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding ‘lanes’ – a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s through roads. Many of these ‘lanes’ are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these ‘lanes’.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

**Accordingly, we OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.**

**d) There are damaging health & safety implications arising from development at this site:**

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide (‘NOx’) emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the “failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition” as one of the grounds for this rejection.

**Accordingly, we OBJECT to Policy A35 on grounds of its adverse health & safety implications.**

**e) The environmental impact on protected wildlife will be substantial**

GBC’s *Land Availability Assessment* which supports Policy A35 states that the site lies within the 400m-5km ‘Zone of Influence’ of the Thames Basin Heaths Special Protection Area (‘SPA’). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance (‘SSSI’), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its ‘Thames Basin Heaths SPA Avoidance Strategy’.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of
the SPA is designated as an ‘Exclusion Zone’ where “there will be a presumption against additional new dwellings”. Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - 5km ‘Zone of Influence’ set out under the SPA policy, which requires developers to contribute a new SANG (‘Site of Alternative Natural Greenspace’) to mitigate for potential damage caused to the SPA from new development – the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, we OBJECT to Policy A35 on grounds of its material adverse environmental impact.

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste facility, means that the actual area of land available for housing development at this site is estimated to be around 43 hectares.

f) The development is totally out of keeping with local character, context & distinctiveness:

It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC’s very first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare (‘dph’).

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, we OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.
Concluding remarks

EHPC has major concerns about Policy A35. We consider this proposed policy to be a severe contravention of Metropolitan Green Belt rules. It will result in a new settlement of very low sustainability, it will have a major adverse impact on the infrastructure and environment across a widespread area and it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

Accordingly, EHPC strongly OBJECTS to Policy A35.

In the light of the recent referendum outcome, which will result in the UK leaving the EU, it is inevitable that the population and economic projections for Guilford Borough will need to be reduced.

We presume that GBC will in due course be making such reductions to its proposed housing projections to reflect these changed circumstances. In our opinion, the proposed development at former Wisley Airfield ought to be the very first site in the Borough that GBC should remove from its draft Local Plan as a result of the UK now proceeding to leave the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/758  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are some small changes made in the revised Local Plan to Site Policy A35, Land at Wisley airfield in Ockham. However, these changes do not provide any justification for continuing to include this site within the revised Local Plan.

Having made a downward revision to its housing targets in the revised 2017 Local Plan draft, GBC is proposing to remove a number of development sites that were included in the 2016 version of the plan. The largest site removed is addressed by Site Policy No. 46 located in Normandy ('Land to the south of Normandy and north of Flexford') where a mixed used development of 1,100 homes had previously been proposed.

Whilst EHPC have no objection to the removal of this policy site per se, we would question GBC's decision-making process of site selection which chooses to remove this site from the local plan rather than the Wisley airfield site. Of all the larger sites included in the 2017 draft Local Plan, Wisley airfield has by far the worst sustainability. In the updated 2017 Sustainability Assessment provided by GBC's consultant AqCOM, Wisley airfield is by some margin the site with the poorest sustainability appraisal - it has no less than 8 red flags in the AECOM criteria list. By comparison Site No. 46 in Normandy is much more sustainable yet it is the one selected to be removed from the plan.

In rejecting a 2015 planning application for development at the Wisley site (proposed in advance of the Local Plan) G6C identified no less than 14 reasons to justify their rejection of the planning application, only one of which was the issue of it being in the Green Belt. The reminder highlighted a long list of deficiencies associated with this proposed development including its major impact on traffic flows, its severe environmental impacts, its total lack of existing transport and other infrastructure, as well as many other factors. According to GBC's consultation website, a total of 1,429 comments were registered in the 2016 Local Plan consultation about the Wisley airfield site - 97% of them were against its development. And yet GBC chooses to maintain Wisley airfield as a policy site in the 2017 revised Local Plan.

With a planning appeal due to be heard in September 2017, we trust that if the planning inspector decides to reject the appeal of Wisley Property Investments, then GBC will finally listen to the views of so many of its residents, accept the AECOM sustainability conclusions on the deficiencies of this site and remove Wisley airfield entirely from the Local Plan.
In previous consultations EHPC has already provided detailed reasons for our objections to the Wisley site and there is no reason to repeat them all again here. For these and the many more reasons already provided:

**EHPC strongly OBJECTS to Site Policy A35, the creation of a new settlement at the former Wisley airfield**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/283  **Respondent:** 8929921 / Caspar Hancock  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

11) I **OBJECT** to the inclusion in the Plan of the site at Wisley, which was unanimously rejected by GBC’s own Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2455  **Respondent:** 8930209 / Ray Corstin  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7091  **Respondent:** 8930625 / Malcolm Scott  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site would create an urban corridor stretching from London to Guildford.

The proposed plan does not meet the needs and desires of local communities, as shown 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 former Wisley Airfield, protected.

Serious concerns about development on this site have also been raised by major statutory consultees including Highways England, Thames Water, NATS and the Environment Agency.

I object to the continued inclusion in the plan of a site - the former Wisley Airfield - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

(After 14 months of consideration, and various extensions and amendments, Wisley Property Investments Ltd’s planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8313  Respondent: 8930625 / Malcolm Scott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the detrimental impact on transport, local roads and road safety because of the following:

The development is too isolated, and even within the development itself too spread out to expect reduced reliance on the private car

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

The congestion this traffic would cause not only on the narrow rural roads in Ockham but also the knock-on effect on the immediate and wider local area, exacerbated by wide vehicles including increased bus and HGV movements

The danger this traffic would pose to local cyclists and pedestrians, due to the lack of cycling paths and pedestrian footpaths and the space to provide them

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/4310  
**Respondent:** 8931105 / Elizabeth Murphy  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( No ), **is Legally Compliant?** ( )

1. there is no clear justification for the removal of one strategic site over site A35;
2. the inclusion of A35 would not contribute to the 5-year housing projection due to constraints particularly in the provision of sewerage capacity;
3. the inclusion of a 10% buffer in the housing number over the plan period is unnecessary;
4. the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 is unclear and has been challenged by other experts including NMSS;
5. the transport evidence base including the SHAR 2016 Highways assessment report has been criticised by Mouchel for using out of date modelling software and is therefore unreliable;
6. GBC has directed the transport assessment to use prescribed vehicle movements from this site with no justification;
7. GBC has not as required, used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. The housing number is unsound and open to legal challenge;
8. the disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels;
9. policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound;
10. of the quantity of space allocated for retail in the town centre which could be better used for residential development. Reliance on the Carter Jonas study update 2017 which includes demand for retail space from companies already in administration is strange to say the least;

16: the unfair imbalance of the plan across the borough as regards housing, becoming even more biased against the north east of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

Because of the above and many other reasons cited by the Horsley Countryside Preservation Society, Ripley Action Group and Wisley Action Group all of whom I support, this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Site A35 Wisley airfield. This has been rejected on 14 grounds as a planning application – what is it doing being included in the Local plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3963  Respondent: 8931233 / John Pemberton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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 A35 Three Farms Meadow in the Local Plan because

- It is adjacent to the A.3 and junction 10 of the M.25, both of which are at capacity and need major enhancements and cannot take account of the A.35 traffic implications.
- It is adjacent to RHS Wisley which is scheduled for major modifications leading to 500,000 per annum visitor increase. These have not been included in any traffic studies.
- I object to the various changes in site area and boundaries over the previous plan draft. These require more than a regulation 19 consultation.
- I object to the retention of A.35 in the Plan despite thousands of objections and the refusal of the planning application by Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4185  Respondent: 8933185 / Peter See  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 204, Policy A35: Land at Former Wisley Airfield, Ockham After the first line, add:

Safe and attractive cycle routes, on and off the carriageway, throughout the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1401  Respondent: 8933889 / Nicholas Travers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

I also wish to add that as a young person I object most vigorously to the inclusion of FWA/TFM on the basis that it has been for over 1000 years and remains to this day a working farm which provides much need agricultural supplies to the population of England. The land is also part of the greenbelt – the lungs of London. As a young person I believe that the elected officials in this borough have ridden rough shod over the concerns of over 20,000 residents in their drive to get large tranches of financial aid from large property developers and central government. This need for funding is transparently obvious to most residents while most of the ‘elected’ GB Councillors continue to deny this is the reason they have ‘opted’ for the ‘story’ that Guildford’s housing needs are as high as they suggest. Organic growth in the villages is what is needed not this fixation on building large (2000+ houses) numbers of houses on the middle of a farm in the middle of the rural village of Ockham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6356  Respondent: 8933953 / Stephanie Billington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The harmful effect on the Horsleys is magnified by the proximity of the so-called Wisley Airfield Site. This site is key to the maintenance of the Green Belt and building a new settlement here would contribute to the creation of an urban corridor through the Green Belt. It has high amenity, farming and historical value. A planning application has recently been rejected by GBC on numerous grounds. For all these reasons, the site should be removed from the Plan now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3021  Respondent: 8934657 / Nigel Watson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
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 allow the creation of a substantial new town at Wisley airfield.

The small changes made in the revised Local Plan to Site Policy A35 do not provide any justification for continuing to include this site within the revised Local Plan. I question GBC’s decision to remove certain other sites from the local plan’s development proposals, rather than the Wisley airfield site. Of all the larger sites included in the 2017 draft Local Plan, Wisley airfield has by far the worst sustainability. (See the updated 2017 Sustainability Assessment provided by GBC’s consultant AECOM; Wisley airfield is by some margin the site with the worst score – it is given 8 red flags in the AECOM criteria). In rejecting a 2015 planning application for development at the Wisley site (proposed in advance of the Local Plan) GBC identified 14 reasons to justify their rejection of the planning application, including: its being in the Green Belt; its major impact on traffic flows; its severe environmental impacts; its total lack of existing transport and other infrastructure; and many other factors. According to GBC’s consultation website, a total of 1,429 comments were
registered in the 2016 Local Plan consultation about the Wisley airfield site – 97% of them were against its development. So why has GBC chosen to maintain Wisley airfield as a housing site in the 2017 revised Local Plan?

A planning appeal on Wisley airfield is due to be heard in September 2017. If the planning inspector decides to reject the appeal of the current developer (Wisley Property Investments), GBC should finally listen to the views of residents; accept the AECOM sustainability conclusions on the deficiencies of this site; and remove Wisley airfield entirely from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5662    Respondent: 8937601 / Dan and Nicola Truman    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
* There is very high pollution at Junction 10. The sensors record levels similar to Central London.

* The drainage in the area is poor. Most years there is flooding on the 82039 near the busy Wisley roundabout - the very spot designated as the main access point to the Wisley Airfield development!

* I am particularly incensed with all this devastation to our wonderful Green Belt making money for a Cayman registered company!!!

* I object to the inclusion in the Plan of The Thatchers Hotel and Wisley Airfield, both of which have been refused planning permission by GBC recently.

GBC needs to listen to the electorate and reassess its objectives! I would ask GBC to reconsider its plan to ruin our villages and attack our Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4098  Respondent: 8938881 / Ann Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley Airfield

I strongly object to the proposals for the airfield. I note modest changes have been suggested. However these do NOT justify including this site within the amended plan! This site has poor sustainability. The viability of this area so close to one of the busiest junctions on the M25, so close to one of the most important gardens in the UK, so close to Boldermere Lake and so close to an important conservation area really defies belief! There are enormous constraints on any infrastructure improvements in the area – there is poor drainage in much of the surroundings and even now if there is a problem at Junction 10 all local roads see the effect. East Horsley is the neighbouring village that would have to provide access to trains & shops and scope for improving the congested road structure here is very little limited. In this area most of the main roads go from east to west BUT most people wish to travel south to north. This results in much traffic travelling on the narrow village roads lined with sizeable houses; bottlenecks provide an extra hazard!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1654  Respondent: 8939617 / Jeremy Cowell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the draft Local Plan and in particular the inclusion in the plan of the former Wisley Airfield (Allocation A35) for the following reasons:

Building on the Green Belt

Huge increase in car traffic

Increased air pollution

GBC’s planning committee unanimously turned down WPIL’S application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3434  Respondent: 8939617 / Jeremy Cowell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the Local Plan, particularly in regard to the former Wisley Airfield site which I believe is allocation A35.

The site could generate an extra 4500 cars which could lead to an impossible situation around the local roads and the A3.

The site is greenbelt, it is farmland and it is adjacent to the TBHSPA and is thus totally unsuitable for such a large development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/466  Respondent: 8943841 / Jean Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
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  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5966  
**Respondent:** 8944513 / Suzanne Carr  
**Agent:**

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I grew up in Cobham, and then after university in Manchester and living for a while in London, I moved back to Surrey and to Ockham 10 years ago to start a family, and to allow my children to experience the benefits of the Green belt. I have been amazed and depressed by the sheer scale of development you have proposed as part of this local plan, and in particular the development on the Former Wisley Airfield that will effectively back on to our home and shatter our quality of living, and the lives of those around us in Ockham, Ripley and the Horsleys. This is a massive threat to local flora and fauna, there is no way that the local infrastructure can support it and the overall impact on this part of the borough will be devastating. No wonder this was thrown out when reviewed objectively by the Planning Committee.

In summary then I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
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  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

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Document page number 1518
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
distressed to see that since this proposal was last dismissed by the Planning committee, the land has now expanded and moved even closer to the residents along Ockham Lane (including our own house).

In summary then I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7781  
Respondent: 8944929 / A Jefferies  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the allocation Three Farms Meadows – allocation A35. I object to the proposed removal of this site from the green belt when no exceptional, very special or special circumstances exist. I object due to:

1. Unsustainable nature of site reliant on private cars and undeliverable public transport [in terms of unrealistic journey times/fabricated modelling which do not stand up to scrutiny]
2. Unrealistic assumptions that people will even walk from one end of the development to the other to go to the doctor, school, shop etc.
3. Unsustainable due to poor air quality impact on both housing and the SPA
4. Impact on views to and from the Surrey Hills AONB
5. The urban nature of the proposal – five storey buildings are out of keeping in the countryside [and some would argue are not even acceptable in Guildford town centre]
6. Road, sewerage, fresh water, gas and electric capacity does not exist.
7. Funding for infrastructure from Central government does not exist;
8. There is already a huge infrastructure deficit in terms of roads. This is not properly taken into account.
9. Impact on nitrogen deposition on the TBHSPA is not neutral and this allocation is therefore open to legal challenge.
10. No consideration has been taken of the current and future plans of the RHS Wisley. These should take priority over allocation A35. Roads definitely cannot accommodate an additional 500,000 visitors to the RHS and 5,000 residents of site A35. [this is without taking into consideration the huge number of houses planned in the Horsleys, Send and Ripley].
11. Robust objections to the planning application almost identical to this allocation were made by numerous statutory bodies including neighbouring Local Authorities.
12. Insufficient consideration has been taken of the historic houses in Ockham and Ripley and the Chatley Heath Semaphore Tower

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4342  
Respondent: 8944929 / A Jefferies  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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? ( ), Sound? ( ), is Legally Compliant? ( )

42. I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

43. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

44. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

45. It is further from railway stations than any other identified strategic site.

46. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

47. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

48. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

49. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

50. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   o The associated traffic increase from the RHS has not been taken into account.
   o The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

51. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis

52. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

53. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

54. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

55. Opportunity (3) should be common to all sites and is not unique to this site

56. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

57. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

58. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

59. I object to the removal of additional 3.1 ha from the green belt without any justification
60. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

61. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

62. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

63. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

64. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3000  Respondent: 8947105 / Roy Harrington  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. 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. 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.

4. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Site A35 - Land at former Wisley Airfield Ockham

I OBJECT to this site being included. It is in the Green Belt and there are no exceptional circumstances for its removal.

Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development, so there can be no justification for including it in the local plan.

There is no need for housing on this site because the local plan housing target is incorrect and inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed strategic settlement (Policy A35) at the former Wisley airfield on each of the following grounds:

- It is not accepted that any residential development is needed at this Green Belt site, for the reasons set out above.
- Removing Wisley airfield from the Metropolitan Green Belt will encourage urban sprawl all the way from Guildford to Cobham and The site is only partly brown field (the old runways and apron area). The rest of the site is untouched agricultural land and should continue to be afforded Green Belt protection.
- The proposed Wisley airfield development will have a major adverse impact on wildlife and rare
- The development will have an adverse impact on the TBHSPA and it is unclear whether the limited provision of open space in the middle of the development will discourage the 4000+ new residents from intruding onto the TBHSPA, threatening the rare species it contains.
- The present airfield site is an important open space for local walkers and cyclists, who will not wish in future to visit what will become an industrialised building Again, this may put the TBHSPA under further pressure.
- The development will overload existing primary and secondary schools in the area, as the Infrastructure Development Plan states that there will be no provision of new school capacity before the development is substantially
- If the proposed waste processing facility goes ahead at Wisley it would be inappropriate to place residential developments close
- It is proposed that around 40% of the housing be affordable Wisley airfield is not a suitable location for large settlements of social housing given the lack of local employment opportunities, the very limited local community shops and other amenities proposed, the lack of local public transport links, and the difficult access without car to Ripley, the Horsleys, and further afield to Guildford, Leatherhead, and Woking. You are in danger of creating a ghetto of deprivation far removed from the services and support that a large social housing development would require.
- The proposal assumes that pedestrians and cyclists will be willing to walk or cycle 4-5km to either Effingham Junction or Horsley stations but this is wishful Pedestrians and cyclists will be exposed to traffic on existing busy narrow roads where there is no room for either pavement or dedicated cycle lanes and it is unlikely that walking or cycling this distance on busy roads would appeal to most residents of a Wisley airfield development.
- Instead it is likely that most residents would choose to use their cars to get to and from a train station - but neither Horsley nor Effingham Junction stations have sufficient car park capacity to absorb the several hundred additional commuter vehicles that might be expected once the development is The additional train commuter traffic would also overload the existing rush hour train services – but there is no scope to increase train size (due to platform limits) or rush hour train frequency (due to capacity constraints at Clapham Junction).

- The already severe local rush hour congestion at the A3/B2039 and A25/M25 junctions and elsewhere will be significantly worsened due to an additional 3-4,000 cars belonging to Wisley airfield residents on the The air pollution at these locations, already in excess of EU standards, will be correspondingly worsened.
- 3-4,000 new residents’ cars will also create additional congestion problems on the B2039 Ockham Road South in East Horsley, particularly at times of peak traffic Automatic traffic surveys by Surrey County Council regularly report peak hour traffic flows approaching 80% of the peak traffic flow on the main A246 – on a minor road which in places is too narrow for two HGVs to pass and too narrow even to justify its B-road classification according to Department of Transport standards. There is no practical scope to widen the road or provide alternative routes to cope with any significant increase in car traffic.
- The development will place additional strain upon the Horsley Medical Centre, which is already operating at or beyond capacity – it can take 3-4 weeks to get a GP It is unclear what expansion is possible at the site given its
proximity to a Designated Open Space (Kingston Meadow) and to the nearby storm drain. Car parking capacity at the Village Hall and Medical Centre is already insufficient to meet demand, and Kingston Avenue is frequently congested by overflow car parking.

The Wisley airfield development cannot therefore be regarded as ‘sustainable’ and should be withdrawn from the Plan for the reasons given above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed development of 2100 homes and supporting infrastructure on the former Wisley Airfield. This site is the most open piece of Green Belt one could imagine and is visible from the Surrey Hills AONB. For brevity I will not detail the myriad of reasons why this proposed development is unsuitable as the Council clearly understand them full well since it refused this application unanimously only recently. This proposed development is of the wrong type, in the wrong place at the wrong time.

It must be removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The Ripley Society exists to promote and encourage, for the benefit of the public the improvement, protection and preservation of the countryside of Ripley together with the surrounding villages enabling better development of the rural environment. Originally affiliated to the Surrey Amenity Council and more recently to the Surrey branch of the Campaign to Protect Rural England, it als identical objectives of the CPRE nationally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy A35 and Policy S2

We object to the Former Wisley airfield being included in Policy S2 as a strategic development site.

We also object to Policy A35 which sets out details of the proposal to develop the former Wisley airfield.

The main reasons for our objection on these policies are as follows:
1. Inappropriate development in the Green Belt, and no exceptional circumstances being evidenced for the removal of the land from the Green Belt.
2. The site does not exhibit the necessary sustainability, as shown by adverse sustainability appraisal reports.
3. Air quality at the site is in excess of EU permitted levels.

4. The increased volume of road traffic on roads which are already severely congested, and which are regularly and frequently used by leisure cyclists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/5220  **Respondent:** 8957409 / Horsley Countryside Preservation Society (Roy Proctor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

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3. Air quality at the site is in excess of EU permitted levels.

4. The increased volume of road traffic on roads which are already severely congested, and which are regularly and frequently used by leisure cyclists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1276  **Respondent:** 8958369 / B.P. Austin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the proposal to create a settlement on the former Wisley Airfield (Site A35). This is both an unjustified breach of the Green Belt and folly. The size of the site and proposed large population will inevitably have a damaging impact on the adjacent Thames Basin Heaths Special Protection Area where all three vulnerable species, woodlark, Dartford warbler and nightjar breed. Damage will come not only from pressure of people but the lethal impact of their dogs and cats. The required regulatory buffer area will not be sufficient in reality for a site of this size.

2. Even more serious is the lack of proper infrastructure and transport links. Despite the words about promoting walking and cycling the reality will be that this will be an isolated settlement of commuters without sufficient on-site employment and dependent on cars. The inadequate local access to the site has already been exhaustively examined and rejected, it has not changed. The suggestion that a 5 kilometre cycle ride is acceptable is fantasy in terms of families with children, shopping, bad weather and dangerous local roads. It makes no sense to create a large car-dependent settlement next to the overladen M25 and A3 where the pollution levels are already well above permitted levels and traffic congestion is chronic. The plan makes no serious proposals for the provision of basic services such as electricity (where will the generating capacity come from?) water and sewage which will be well beyond present capacity. There is nothing sustainable about this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3333  **Respondent:** 8971233 / Tim J. Harrold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**CPRE OBJECTION TO SITE POLICY A35 : LAND AT FORMER WISLEY AIRFIELD**

CPRE objects to the continued inclusion in the draft Local Plan of the Former Wisley Airfield (FWA) now known as the Three Farms Meadows (TFM). This development was rejected unanimously on 8th April 2016 by the GBC Planning Committee when it was submitted as a planning application prior to the draft Local Plan being published. This decision was recommended by GBC Planning Officers. We can see no justifiable grounds for this development to now be reintroduced. The arguments for its refusal as a planning application are still as valid as before: Our objection to the former Wisley Airfield development reflects exactly our overall opposition to the draft Local Plan in which over 70% of new housing is to be built within the Green Belt. The GBC proposal conflicts with promises made to the electorate in this context. In our view there is ample brownfield land available in the urban area which should be used for housing instead of attention being concentrated on unsustainable sites in countryside outside the town. No exceptional circumstances have been established to warrant removing land from the Metropolitan Green Belt, which is characterised by its openness and permanence, to permit urban sprawl to spread onto agricultural land in attractive countryside.

We object in particular to the disproportionate allocation of housing to Green Belt land in this segment of the borough. Over 23% of the draft Local Plan's new housing is supposed to be provided in the immediate vicinity of Ockham, Ripley, Send and the Horsleys, and of this total 65% is allocated to the former Wisley airfield.

CPRE objects to the way in which the draft Local Plan for this site will overwhelm the historic rural village of Ockham nearby - which has only 159 residential houses - and destroy its attractive character and identity that depends on its many listed properties, absence of street lighting, and very few pavements. This charming small community which can only be accessed by narrow sinuous lanes will be sacrificed to the proposed new development units.
immediate vicinity of more than 2,000 houses with high density urban buildings of up to five storeys in height spread out in an urban sprawl of unattractive new construction in open agricultural countryside.

We object to the statement that the new development will result in a significant shift to cycling and walking as a means of conveyance. It is incorrect to suggest that such an isolated built-up location would reduce reliance on private cars as a means of transport to Guildford and neighbouring villages and railway stations. A proposed development of 2,068 homes will result in an estimated 4,000 additional cars on the roads. The added congestion that this will cause on the narrow country lanes in Ockham and surrounding areas will be a source of increased safety hazard to any cyclists and walkers. This will be made worse by the likely increase in bus and HGV movements from the new location with its additional school traffic. No footpaths or cycle lanes are present along these rural roads.

We object to any increase as a result of the proposed new development to the already severe congestion on the A3 and M25 which will require significant infrastructure enhancements.

Work in this context to the A3 South of the site is not expected to be begun until 2019 at the earliest.

We also object to the way in which concern about the harm caused by traffic on the A3 and M25 to Air Quality has been treated with insufficient attention. Air pollution is already known to be a problem in many parts of the borough which needs to be tackled. We understand that for example the A3/M25 junction exceeds EU permitted levels and is comparable to air pollution in Oxford Street in Central London where only diesel traffic is present. The additional congestion that will be generated by the new development and by the proposed expansion of daily visitor attendance at the Royal Horticultural Gardens will only make this problem worse. The relevant authorities are well aware of the adverse impact on the health of local residents and plant life that increased traffic causes in terms of air pollution and will need to give this more urgent priority.

We object to the lack of consideration given to the environmental and ecological value of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and a Site of Nature Conservation Interest (SNCI) which will all be harmed. Traffic noise disturbance has been shown to have a negative impact on bird life which is of particular concern with regard to the SPA.

CPRE notes that concern has been expressed by a wide range of authoritative organisations about this development including Highways England, Thames Water, NATS and the Environment Agency.

The Minister of State has made it clear in a recent statement that housing need and/or demand is not sufficient grounds for encroaching onto open Green Belt countryside and that it is up to “local people” to express their objection to development of this kind. The proposed Local Plan does not meet the needs and desires of local communities. The two top responses in the Ockham Parish Plan call for:

1. Access to the countryside and clean air
2. The peace and quiet of wide open spaces

Over 90% of the local people in this community wish to see both the village’s historic features maintained and the former Wisley Airfield now known as the Three Farms Meadows protected.

CPRE agrees with them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECTION TO SITE A35

Since I was born in Ockham and lived the early part of my life in Effingham I want to object at the enclosure of the Three Farms Meadows site in the Draft Guildford Local Plan:

The grounds for my objection are as follows:

1. The application for this site was refused by the GBC Planning Committee unanimously and therefore should not have been included in the GBC draft plan.

1. The village of Ockham should be protected against the overwhelming damage that will be done to it should this mixed use development be allowed to proceed.

1. There will be a loss of Green Belt agricultural land at the Three Farms Meadows site if this proposal goes further.

1. The increase of car traffic from this development will have a damaging effect on the congestion at Junction 10 of the A3 and the M25.

1. Air Pollution on the A3 and the M25 will increase if 2,000 more houses are built at the Three Farms Meadows site and their cars start to use the A3 and other local roads.

1. The site is a unique area of countryside with productive farming and is a home for a broad spectrum of wildlife, flora and fauna.

1. Transport links are inadequate and the two nearest stations are several miles away. Their car parks are already full by the end of the morning rush hour.

1. The site is unsustainable as there are no employment opportunities on Three Farms Meadows for the vast majority of the people when they move there.

1. The site is 300 acres in size of which 75% is open countryside with magnificent views in all directions.

Please will you make sure that this objection is recorded and take note of my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
both the Horsleys and Ockham. My plea is to please do not ruin the area as is currently proposed in your draft local plan to which I strongly object for the following reasons:

1. I object to a plan which proposes over 70% of new housing to be built within the Green Belt.
   1. I object to the removal of the former Wisley Airfield from the Green Belt
   2. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment as far too high.
   3. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.
   4. I object to the threat that the local plan poses to the historic rural village of Ockham.
   5. I object to the threat that the local plan poses, as it will have a massive influence on planning decisions in the Boroughs of East and West Horsley.

(a) The Boundaries for our villages will be greatly enlarged.

(b) The village areas inside these boundaries will be removed from the Green Belt.

(c) The Horsleys are likely to have more than 533 new houses.
   1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the all sites, both Ockham and the Horsleys.
   2. I object to the fact that air quality concerns have not been taken seriously, especially in Ockham
   3. I object to the fact that the proposed plans do not meet the needs of the local communities in both the Horsleys and Ockham.
   4. I object to the inclusion of the Wisley airfield site in the plan, where a planning application has been unanimously rejected.

To sum up I strongly object to the proposed major suggestion of altering the GREEN BELT, which we were assured by our MP was not a requirement of the Government.

Further the infrastructure in both Ockham and the Horsleys is totally inadequate to consider anything but very modest development as has been happening over the last fifty years. Even with this our infrastructure is under considerable pressure and without any development needs upgrading.

It must be appreciated that any major development at Ockham will greatly affect all facilities around that area especially the Horsleys.

The Plan must be amended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and has objected against prior planning applications at this location. We consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly object to Policy A35 and will provide a more detailed submission outlining my arguments against this policy in a separate letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2694  Respondent: 9051617 / Carol Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
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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 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heath SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally, I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2693  Respondent: 9051713 / Margaret Mills  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIl) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3702  Respondent: 9062913 / Susan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

Previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.

10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on 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:** PSLPS16/6076  **Respondent:** 9070145 / Don Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I strongly object to the building of over 2000 houses on the former Wisley Airfield. This will destroy Ockham conservation together with the impact on listed buildings and will create a major impact on the Horsleys, Effingham and Cobham. This project would contribute to major traffic chaos that already exists on the A3 and M25. Local roads will be unable to cope with the additional volume of traffic. There is no existing public transport and the railway stations are some distance away. I gather that it has been suggested that residents will be coached to Effingham and Horsley stations. With the school coaches on the same roads can you envisage the absolute chaos that will prevail.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7064  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Charles Collins)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I strongly object to the building of over 2000 houses on the former Wisley Airfield. This will destroy Ockham conservation together with the impact on listed buildings and will create a major impact on the Horsleys, Effingham and Cobham. This project would contribute to major traffic chaos that already exists on the A3 and M25. Local roads will be unable to cope with the additional volume of traffic. There is no existing public transport and the railway stations are some distance away. I gather that it has been suggested that residents will be coached to Effingham and Horsley stations. With the school coaches on the same roads can you envisage the absolute chaos that will prevail.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Please find enclosed representations on the Proposed Submission Local Plan: Strategy and Sites, submitted on behalf of our client, Wisley Property Investments Ltd (WPI).

The Council will be aware that WPI control land at Wisley Airfield, which has been proposed for allocation within draft allocation A35 in the Proposed Submission Local Plan.

The Representation highlights and where necessary expands upon representations submitted by WPI at the Issues and Options stage of the Local Plan process in November 2013 and the subsequent Strategy and Sites consultation in September 2014.

The representations provide further technical justification for the proposed new settlement allocation at Wisley Airfield (draft policy A35). The proposed allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will deliver homes to meet the urgent and pressing needs.

WPI’s representation is structured in the same order as the draft GBLP. The representation conveys the due merits of land at Wisley Airfield throughout. An executive summary is provided.

The representations are supported by 11 technical appendices. These include relevant appendices which act to support the proposed allocation of a new settlement, and demonstrate that all of the reasons for refusal associated with the planning application (ref. 15/P/00012) are either capable of being addressed, or have been addressed.

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: PSLPS16/7953  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Charles Collins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Executive Summary

• Wisley Airfield represents an exceptional development opportunity for a new countryside community. It is the proposed new sustainable settlement within Guildford Borough. Wisley Property Investments Ltd (WPI) strongly supports the draft allocation of the Wisley Airfield site for a sustainable residential-led development of a new settlement (draft Allocation A35) within the pre-submission Guildford Borough Local Plan (GBLP). The draft allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will result in the delivery of homes to meet the urgent and pressing needs.

• The Masterplan and Design Vision for Wisley was first submitted to Guildford Borough Council (GBC) in December 2014 (planning application reference 15/P/00012). The Masterplan has been further enhanced following representations made on the application. The Masterplan has been created following over three years of work, as informed by ongoing engagement with key consultees, stakeholders and the public. This is shown on the Concept Plan included within these representations (Appendix 2). WPI held a series of public engagement events in May 2014, and has hosted Project Engagement Panels. In addition to the comments made in 2014 (63% of respondents were either neutral or positive about the proposals), updated telephone surveys undertaken in March 2015 indicate that 46% of respondents support the proposals, and 16% are neutral. A further street survey undertaken soon afterwards demonstrated 65% support for the proposals. Most recently, a public survey undertaken in May 2016 of people under 40 demonstrated 76% as either supportive or neutral and only 15% against the proposed development, with 76% believing that there are too few affordable homes in the Borough (see Appendix 10).

• With over 70 acres of concrete/hardstanding, Wisley Airfield contains the largest previously developed site within the present Guildford Borough Green Belt. Out of all the strategic sites allocated within the GBLP, in
its entirety, it contributes the least to the four purposes of the Green Belt, is outside the AONB and is least constrained by highways (see Appendices 3 and 8).

• Based on the updated ‘objectively assessed housing need’ of 693 dwellings per annum (as identified within the September 2015 SHMA), GBC proposes an achievable suite of development allocations, and proportionate amendments to the Green Belt boundary, including new areas of Green Belt. This will facilitate the land supply over the plan period. The Wisley new settlement can deliver circa 210 dwellings in the next five years of the plan period (2016-2021). This figure has been adjusted to allow for the implementation of the significant green infrastructure provision (Suitable Alternative Natural Greenspaces - SANGs), and reflects the prospect of a resubmission planning application alongside the progress of the GBLP.

• The Wisley Airfield site is an obvious location for growth and, as an assembled site, it is available for immediate development and could make a significant contribution to Guildford’s five-year housing land supply.

• A community of approximately 2,000 homes at Wisley Airfield would be fourth in the Guildford Borough settlement hierarchy, providing the sustainable services and amenities associated with a Sustainable Settlement (see Appendix 8).

• The settlement would deliver around 6,000 sq m of employment and retail floorspace, potentially accommodating some 350 full time equivalent permanent jobs (on top of those employed in the development’s construction) and include facilities to support home working, further reducing travel demand. Additional consumer spending in the local area (excluding housing, fuel and power costs, VAT and leakage), based on 2,000 dwellings, would be around £31.86m per annum. The Housing & Planning Act 2016 makes clear that financial considerations are relevant material planning considerations.

• The development would complement existing villages, providing additional, well connected local infrastructure including a new primary and secondary school, leisure and health provision. This would relieve the pressures on overstretched existing services and amenities, such as schools, and contribute positively to the Surrey County Council (SCC) Surrey Infrastructure Strategy (2016) and the Appendix C Infrastructure Delivery Schedule of the GBLP. The new settlement would, in particular, address wider education needs, as outlined in Appendix 5.

• Wisley Airfield is within five miles of nine mainline railway stations including Woking. The development would provide in-perpetuity bus provision, secured through a Community Trust, potentially delivering a 7-10 minute target frequency (see Appendix 11). This would greatly improve sustainable transport access both to the development and to the local villages.

• Wisley Airfield has consented direct access onto the strategic road network at the A3 Ockham Interchange. Its development would provide a package of measures, deliverable in the short term, to directly improve a section of the A3, significantly reducing accident costs and improving journey time reliability for the region. Transport modelling, based on the SCC ‘SINTRAM’ model, confirms that its proportional contribution towards improvements at M25 J10 would assist in reducing congestion and improving safety. The new settlement would complement the proposed Road Investment Strategy 2 (RIS 2). The relevant transport technical background is provided in Appendix 3.

• The Wisley Airfield site would be a sustainable, successful place that promoted wellbeing, developed by understanding what people need from the places where they live and work. The proposals engender social sustainability by combining design of the physical realm with design of the social world – infrastructure to support social and cultural life, social amenities, systems for citizen engagement, and space for people and places to evolve. The sustainable communities created would meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice.

• The new settlement would also enable the delivery of significant SANGs. The SANGs Strategy submitted with the planning application met with no objection from Natural England. An ecology technical report is included in Appendix 4.

• WPI is working to resolve the outstanding matters arising from the determination of application 15/P/00012, as outlined by the Key Considerations provided in Appendix 1. None of the reasons for refusal question the suitability of the proposed allocation.

Introduction

This Representation has been submitted by Wisley Property Investments Ltd (WPI) as part of the consultation on the emerging Guildford Borough Local Plan: Strategy and Sites (Proposed Submission Version, June 2016) (GBLP). The Representation highlights, and where necessary expands, upon representations submitted by WPI at the Issues and
Options stage of the Local Plan process in November 2013 and the subsequent Strategy and Sites consultation in September 2014.

The Wisley Airfield site was originally promoted to allow for the determination of a planning application concurrent with the Local Plan process. The application, ref 15/P/00012, was submitted in late 2014 to support the emerging Local Plan, the production of which was subsequently delayed. The application was determined in April 2016. None of the reasons for refusal are insurmountable. The Key Considerations are outlined in Appendix 1.

WPI is the majority landowner within draft Allocation A35. Wisley Airfield comprises circa 115 hectares (ha), of the circa 132 ha allocation. WPI has been in liaison with the adjoining landowner who controls Bridge End Farm to the south. It is understood that this land is also available for development.

Following the submission of the application, WPI continued to liaise with the full range of statutory consultees and stakeholders, including Guildford Borough Council (GBC) and Surrey County Council (SCC). The representations made on the application, alongside the Environmental Statement (ES) and technical evidence submitted by WPI, have acted to further demonstrate the delivery of the new settlement, and support the proposed Local Plan allocation. During the consultation process on the application, further information was required to refine and modify the proposals. To this end an addendum submission package was submitted in December 2015, to clarify and provide further evidence in support of the planning application for a new settlement at Wisley Airfield.

This Representation provides further technical justification for the proposed new settlement allocation at Wisley Airfield (draft policy A35). The proposed allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will deliver homes to meet the urgent and pressing needs.

The Representation is structured in the same order as the draft GBLP. The responses within the Representation are supported by 11 technical appendices. These include relevant appendices which act to support the proposed allocation of a new settlement, and demonstrate that all of the reasons for refusal of the application are either capable of being addressed or have already been addressed.

Table 1.4 outlines a summary of all of the representations made by WPI.

WPI is in broad support of the GBLP. In summary, WPI has the following principal technical concerns with the GBLP:

- Clarity should be provided in respect of the proposed housing policy (draft policy S2) to ensure that the full housing requirement is outlined in the policy, in addition to a credible phasing of the housing allocations to enable a rolling five-year supply of housing. To enable the objectively assessed needs (OAN), the housing policy must be based on the delivery of ‘at least’ 13,860 dwellings (see Paragraph 3.10 onwards).
- The draft allocation of the Wisley new settlement should be effective and implementable. The proposed SNCI designation over the whole of WPI controlled land is unjustified, and an amendment is suggested (see Appendix 4). It should also be made clear that it is not the purpose of a Local Plan to make waste allocations, and thus the present waste notation is merely reflective of what the present 2008 Surrey Waste Plan includes (see Appendix 6). Further technical concerns are outlined, notably with respect to the convenience retail provision outlined by the emerging policy.
- The delivery of affordable housing should be expressed as a ‘target’. The provision of land at nil land value is unevidenced and unlikely to be effective (see Paragraph 3.29 onwards).
- The requirement for all development to connect (or safeguard) Combined Heat and Power (CHP) is unjustified and likely to be economically unviable or technically unfeasible. The GBLP should reflect the Housing Standards Review and not repeat or seek to conflict with Part L of the Building Regulations (see Paragraph 3.73 onwards).
- The Sustainability Appraisal (SA) is broadly considered to be robust and soundly prepared. It demonstrates the need for all of the major strategic site allocations (as per Option 4). The SA should be enhanced, to include an accurate description of the Wisley new settlement to be consistent with the Housing Delivery Topic Paper. In addition, a further SA Option which includes the Wisley new settlement as OAN plus 6% buffer (an ‘Option 2A’) should be tested. This would provide additional support to the Local Plan (see Paragraph 2.3 onwards).

Wisley Airfield: A Sustainable New Settlement within Guildford Borough
Wisley Airfield contains the largest previously developed site in the Guildford Borough Green Belt. It is an exceptional opportunity for the Borough. Using the principle of sound planning, and a contemporary approach to architecture and landscaping, the community created would not only contribute significantly to the pressing local housing needs, but also create a settlement of distinct character, with facilities and amenities to benefit the wider villages in the area. The infrastructure delivered with the proposal would also provide potential county-wide benefit, for example the open spaces created to mitigate the Ockham Common Special Protection Area (SPA) and in respect of infrastructure enhancements to the A3 corridor to London.

This Representation provides further technical evidence to update that which accompanied the representations of November 2013 and September 2014. The evidence provided in respect of the Guildford Settlement Hierarchy (May 2014) demonstrates that a new settlement at Wisley Airfield has the potential to be a Rural Service Centre, fourth in the settlement hierarchy, aligned to East Horsley and behind only the major established settlements of Guildford town and Ash/ Tongham (see Appendix 8). GBC through the draft allocation has recognised that the site is far from isolated, and is well connected to other settlements in the locality.

Draft Policy A35 outlines a requirement for the provision of a local centre, employment floorspace, a new primary/secondary school, community and health centres, shops and open spaces. These aspects are supported by WPI, and form part of our site promotion as outlined by the Concept Masterplan (Appendix 2). The provision of these facilities and services will contribute to the delivery of a sustainable development and increase the ‘self containment’ of the new settlement.

Updated evidence is also provided on transport (Appendix 3) which demonstrates a potential highways mitigation package, and substantial public transport provision/enhancements to enable the delivery of a new settlement at Wisley and to support sustainable transport at a number of existing villages. This is based on the emerging Infrastructure Delivery Plan (IDP), Appendix C (Infrastructure Schedule) and the Surrey Strategic Highways Assessment (2016). The site is very well related to Effingham Junction Station and is within five miles of nine railway stations in total, with direct access onto the strategic road network (which benefits from consented improvements). In addition, the development would provide improvements and extensions to existing bus routes, potentially delivering a 7-10 minute target frequency on some services, with funding to encourage the use of buses, for example by offering enhanced levels of frequency (this is based on in-perpetuity funding as set out in Appendix 11). This would greatly improve sustainable transport access both to the development and to the local villages. Critically, by virtue of its location on the London side of Guildford town, the site would have reduced impacts on the constrained A3 corridor through Guildford town when compared with selected other proposed allocations.

Further comment is made on the detail of the GBLP in respect of a need for the plan to positively recognise those key strategic items of infrastructure (as ‘projects’) which need to be delivered to enable the whole plan (to 2031). Improvements to the A3 corridor will be best undertaken via a collaborative approach involving GBC, SCC and the Highways Agency. Minor alterations to the GBLP Appendix C (Infrastructure Schedule) are therefore suggested. Commentary is also made with regard to the GBC Topic Paper ‘Infrastructure and Delivery’.

In landscape terms, the site is well contained, as recognised in the independent Green Belt and Countryside Study (GBCS) undertaken by Pegasus (April 2014 update) on behalf of GBC. As outlined in WPI’s previous representations, detailed visual impact assessment work has been undertaken to inform the Concept Masterplan (Appendix 2). An update to the Green Belt assessment work is provided in Appendix 8. In the broader sense, the site is located relatively far from the nearest settlements, it is not within an AONB, and is well screened in landscape terms. The findings of the GBCS are supported in principle. WPI remains of the opinion that Wisley Airfield is one of the proposed allocations in the GBLP that contributes to the fewest of the purposes of the Green Belt. It is low to medium sensitivity, as outlined on Table 1.1.

In respect of Ecology, the proposals result in a substantial quantitative increase in habitats, supporting ecological objectives. In addition, the previous planning application received no objection from Natural England (see Appendix 4). WPI objects to the unjustified allocation of the whole of Wisley Airfield as an SNCI. Alternative evidence of a more robust SNCI area is provided in Appendix 4. This should also be judged in the context of the quantitative/qualitative improvements to the ecological baseline proposed, which may be brought forward in accordance with draft Policy I4 (Green & Blue Infrastructure).
The Concept Masterplan contained in Appendix 2 has been created following over three years of work, as informed by ongoing engagement with key consultees, stakeholders and the public. WPI held a series of public engagement events in May 2014, including Project Engagement Panels and has undertaken regular public liaison and surveys since (the history of the consultation is summarised by Appendix 10). The Masterplan outlines the sustainable mix of uses proposed, and extensive open spaces (over half of the site area). Crucially, the design vision is centred on the creation of a unique identity for the new settlement at Wisley, exploiting the opportunity to transform redundant, previously developed land into much needed housing in a unique landscaped setting. All of the community uses are proposed on WPI controlled land, which forms the vast majority of the proposed allocation (circa 115 ha of circa 132 ha).

The development of the Wisley Airfield site creates the opportunity to enable a county-wide recreation area comprising walks and ecological features. The Suitable Alternative Natural Greenspaces (SANGs) are a major opportunity arising from the development, reducing recreation pressure on the adjacent Ockham Common SPA.

Overall, the development would provide much needed affordable homes to meet local needs. The site could provide an outlet for a mixture of all tenures to suit identified needs, such as starter homes (if appropriate), private rented, intermediate and social tenures (up to 800 dwellings). The site would also accommodate some of the Gypsy & Traveller requirement for the Borough; in total up to eight pitches are proposed to conform to emerging policy A35.

Difficult decisions need to be made through the production of a Local Plan, notably in a Borough which is presently 89% Green Belt. Given the irregularity of Green Belt Reviews (the NPPF defines that Green Belt boundaries only be altered in exceptional circumstances, looking beyond the plan period), WPI believes that in broad terms the correct balance has been struck in the GBLP, which results in what is thought to be only circa 1.7% of the Green Belt being released. Through the allocation of justified additional Green Belt at Ash and Tongham, the Borough has achieved a solution which ensures that land which contributes the most to the purposes of the Green Belt is retained and wherever possible brownfield sites such as Wisley Airfield have been allocated for development.

The delivery of a new settlement at Wisley Airfield shall also assist with the protection, where justified, of the Green Belt elsewhere, for example some existing villages.

There are considerable housing needs in Guildford, as outlined in the West Surrey Strategic Housing Market Assessment (SHMA) – which covers Guildford, Waverley and Woking Boroughs. The SHMA evidence indicates that affordability pressures in the West Surrey Housing Market Area (HMA) are significant. House prices are substantially above the South East average. Entry level house prices in Guildford are 10.92 times the typical earnings of younger households, compared to a ratio of 6.45 nationally and demonstrates Guildford Borough as one of the least affordable in the country as shown in Figure 1.2 (Topic Paper: Housing type, tenure and mix).

The updated SHMA is dated September 2015. WPI supports the production of this joint SHMA, which is necessary to assess housing need across the whole housing market area, an approach which is consistent with the National Planning Policy Framework (NPPF). The SHMA outlines an OAN in the order of 693 dwellings per annum (dpa), which equates to the need for ‘at least’ 13,860 dwellings in the period 2013-2033 (693 x 20 years).

As GBC is aware, the existing developable and deliverable land within the urban areas is constrained. Given this, the allocation of Wisley Airfield is justified on the basis of meeting housing needs as part of the overall package of allocations, which total circa 12,400 dwellings over the plan period. A reasonable contingency over and above the OAN is included in the GBLP, once existing commitments, completions and an assumed windfall is taken into account, though the evidence included in the Land Availability Assessment (LAA) should be more clearly outlined in the GBLP, including a housing trajectory. This forms a technical objection as outlined in this Representation from paragraph 3.10.

The Wisley Airfield site is clearly the most deliverable strategic site within the Borough on the basis of the evidence and work undertaken to date, which includes the submission of the required details to support an outline planning application. In respect of enabling the early delivery of the housing trajectory, it should be noted that Wisley Airfield is progressing ahead of both Blackwell Farm and Gosden Hill. WPI makes no objection to either site, but notes the relative highways challenges associated with their delivery, as sites closer to the congested part of Guildford town, and the location of Blackwell Farm adjacent to the AONB. In addition, the proposal in respect of land at Normandy and Flexford is, in relative terms, less sustainable than the proposal for Wisley Airfield, as it proposes fewer dwellings. Neither of
these sites is known to have progressed through even the early stages of planning, and hence in delivery terms both sit behind Wisley Airfield which is better placed to meaningfully contribute to the Five Year Housing Land Supply.

In respect of meeting identified affordable housing needs, the Wisley new settlement may account for up to 25% of annual need within the Borough (during the implementation period, 2018-2030), or circa 14% of total needs over the plan period. It is a significant allocation, ready and assembled for delivery.

Savills, acting as planning consultant, continues to engage in positive dialogue with GBC and SCC and wider stakeholders so that this opportunity may be realised.

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)

Site Allocations – Policy A35 (including Former Wisley Airfield Map (Appendix G))

Object (not effective, justified nor positively prepared in respect of NPPF paragraph 182)

WPI only wishes to comment on one draft site allocation, A35. WPI makes no objection or comment on any other proposed site allocation.

Site Allocation draft policy A35 is strongly supported by WPI. The draft allocation is an obvious location for growth, well connected to highways and public transport (railway stations) to enable the delivery of a rolling five-year supply of land. A large proportion of the site is previously developed, circa 77 acres of the WPI controlled land. The Proposals Map allocation is also strongly supported.

The draft allocation comprises 114.7 ha of land in WPI control, and an additional circa 16.9ha of land allocated to the south, which is within Bridge End Farm. WPI understands that this land is available for development, and is being promoted separately. The constituent parts of the draft allocation to enable the delivery of the new settlement are entirely within WPI land control. The additional land at Bridge End Farm provides additional Green Infrastructure and residential land, not required to deliver the new settlement, but nonetheless proposed as part of the allocation to assist with overall Borough-wide housing delivery. This also reflects the Green Belt & Countryside Study (2014), which assessed the Airfield and Bridge End Farm together, Parcel C18-A, and provides the evidence base for the release of the land from the Green Belt.

Appendix I outlines a summary of Key Considerations relevant to the application 15/P/00012 and the delivery of a new settlement at the Wisley Airfield site. This also relates to paragraphs 4.110 to 4.116 of the Housing Topic Paper (June 2016). The Key Considerations support these representations, and introduce a series of Technical Reports.

The delivery of the new settlement would achieve many of the objectives outlined by Appendix C Infrastructure Schedule and the Surrey Infrastructure Study (2016), as outlined in Table 3.3.

The allocation of the Wisley new settlement has been achieved through the iterative development of a bespoke package of impact avoidance measures, including Suitable Alternative Natural Greenspace (SANG) provision and Strategic Access Management and Monitoring (SAMM), to ensure that any contributions towards likely significant effects on the
Thames Basin Heaths SPA are avoided, in line with Proposed Policy P5 (discussed further below) and Policy NRM6 of the South East Plan.

The proposed package of impact avoidance measures has been agreed with Natural England, who has confirmed that subject to their delivery, it is satisfied that contributions towards a likely significant effect can be avoided. Accordingly, Natural England raises ‘no objection’ to the proposed development which is the subject of planning application 15/P/00012 brought forward in anticipation of the need to deliver this allocation, as detailed in Appendix 4.

WPI, whilst supportive of draft Allocation A35, does however wish to make some technical points of objection.

**Approximate Delivery:** The allocation refers to ‘approximately’ 2,000 dwellings. The GBLP should include a definition of what this means to be effective. For example, +/- 10% is typically considered appropriate to allow sufficient flexibility (for example the Horsham Planning Framework). WPI agrees that flexibility on this point is worthwhile and justified. In addition, the policy effectively allocates 2,100 dwellings, 100 of which are sheltered/ extra care use. In WPI’s opinion, this use should be C2, as this would not trigger the requirement for SANGs for those units (as a C2 use may be suitably controlled with pet restrictions). The GBLP should be clear on this point as it presently outlines the use as ‘C3’.

**Cycling Enhancements:** WPI objects to the Infrastructure Schedule (Appendix C) provision ‘AM3’ with respect to off-site cycle enhancements. Many of these are not deliverable, and do not form part of the sustainable transport strategy, which is based on bus transport. Appendix 3 includes a technical transport update. As part of our ongoing liaison, WPI has had further discussions with Surrey County Council Highways regarding off-site cycle improvements. This is in the context that the sustainable transport measures for the delivery of the Wisley new settlement will be focused predominately on enhanced bus provision.

Draft allocation A35 outlines that off-site network enhancements are required to Effingham Junction, Horsley and Ripley. Off-site cycle enhancements may be provided where deliverable (i.e. within highways controlled land). WPI considers that the measure of the requirement based on the ‘average cyclist’ is ambiguous. The requirement should be deleted. Other routes are still being investigated, but most other off-site improvements would require the lead of SCC through the Highways Act 1980 and other legislation. It would be appropriate for the Local Plan to recognise this.

**Secondary Education Need:** The need for a secondary school on the site has been identified now, as indicated by the available infrastructure evidence (see Table 3.3). In addition, WPI has provided Appendix 5, which outlines clearly the needs generated by the new settlement, which mitigate the impacts and provide wider benefits. Policy A35 states that, “Secondary educational need will be re-assessed at the time a planning application is made, at which time any recent new secondary school provision will be taken into account”.

**Retail:** Based on the updated retail evidence, see Appendix 7, there is clearly sufficient justification for additional convenience retail on the basis of likely spend of the new residents of the Wisley new settlement / retail business turnover to justify a greater scale of convenience retail. This could be in the order of 1,500 sq m total, to sustain an ‘anchor store’. On the basis of the emerging masterplan (see Concept Plan, Appendix 2), the village centre may accommodate total A1-A5 provision of circa 2,240 sq m. On the basis of the evidence submitted (retail and land capacity) the present restriction of 500 sq m of convenience is unjustified and unlikely to be sound. Therefore WPI considers that the total convenience retail should be increased by 600 sq m, to 1,200 sq m. This would create a centre more likely to meet the needs of the new residents and thus would also have sustainability benefits.

**Design to Site Boundaries:** The policy principle should have regard to the overall draft design policy D1 (Making Better Places), noting WPI’s comments on this draft policy with respect to the opportunity created by a new settlement.

**Access/ Egress:** The site benefits from consented and implemented site access. The proposed measures to enhance Ockham Interchange and provide primary site access from this location are included in the Transport Technical Note (Appendix 3). There is no need for this provision in the policy, as any constraint has been resolved. It is noted that the Strategic Flood Risk Assessment (SFRA) acts as relevant evidence to support the GBLP. WPI notes that the existing Ockham Interchange roundabout is partly in Flood Zone 3. It is possible to construct the site access into the Wisley new settlement outside of the area at risk on the basis of engineering/ design. There is no history of flooding on the roundabout. In addition, with respect to the application reference 15/P/00012 the Environment Agency had no objection.
**Traveller Pitches:** WPI is concerned that the GBLP is overly prescriptive with regard to the tenure of the traveller pitches. It may well be the case that these are privately or publically managed. These matters of detail should be left to the planning application stage. Similar to WPI’s representations on affordable housing, WPI also raises objection with respect to nil cost land transfer, and what this effectively means. In addition, it is not clear why the GBLP has to be prescriptive on the phasing of traveller pitches against the delivery of new dwellings, when the Plan is silent on delivery triggers for all other infrastructure provision. In order to best reflect the needs, on a 500-unit basis, an approximately 2,000 dwelling scheme may deliver a different quantum of traveller pitches. Therefore, the draft policy need only refer to ‘up to’ 8 pitches.

As a general comment, it is surprising that the GBLP only outlines one ‘opportunity’ associated with the delivery of the Wisley new settlement. This is listed as to “reduce flood risk elsewhere”. As GBC is aware, there are numerous economic environmental and social benefits arising from the new settlement. It is apparent that a number of other strategic site policies do not include any provisions under ‘opportunity’. To aid the clarity of the Plan, WPI considers that the provision should be deleted.

**Proposals Map/ Wisley Airfield Allocations**

Associated with draft Allocation A35 is the overall Proposals Map and Wisley Airfield Map.

The proposal to include the Wisley Airfield land as a Site of Nature Conservation Importance (SNCI) is unjustified and un-evidenced. Appendix 4 includes an alternative boundary, based on ecological evidence and a robust matrix in accordance with applicable guidance.

Appendix 6 includes an update with respect to the extant planning permission for an In-Vessel Composting Facility (IVC) and the Surrey Waste Plan allocation for a waste use on part of the site (circa 17ha western element). WPI’s position is that the GBLP must be amended with respect to the Waste Allocation to make clear that this simply is reflective of the present Surrey Waste Plan. The GBLP is not a Waste Plan, and GBC is not the Minerals & Waste Authority, and thus it cannot and should not be anything else. No new or updated proposals for waste can be proposed through the GBLP. In addition, WPI considers the GBLP to be inconsistent, as it does not appear to illustrate all Surrey Waste Plan allocations on its Proposals Map.

In summary, based on all of the available evidence and national planning policy, the best use of the land is now for a new settlement.

**Phasing**

WPI outlined a position in respect of the intended phasing of development in the planning application (15/P/00012). The phasing of the dwellings would be completed in accordance with the landscape design of Neighbourhoods, and as such the new settlement has been divided into four ‘Neighbourhood Blocks’. A Concept Land Use Masterplan is provided in Appendix 2.

Based upon an outline planning consent being granted in early/mid 2017, and the first Reserved Matters Submission being made in late 2017, it is envisaged that the first phase of development could commence in 2019/2020. The phasing of development broadly assumes a housing build rate of no more than 50 dwellings per year, per outlet. Between 2019/20 and 2030/31 the four Neighbourhood Blocks can deliver 2,068 dwellings at an average of 172 dwellings per annum. Table 3.4 outlines.

**Table 3.4** is based on the Concept Masterplan, which envisages four master phases, broadly based on four Neighbourhood Blocks of development, which sit within the three proposed neighbourhood character areas.

The delivery of the employment area and local centre including the primary school will be phased in detail through a detailed submission phasing plan. This will also include the phasing of the proposed traveller pitches. It is suggested that this can be addressed via suitable planning condition. This will need to have regard to wider constraints and obligations, including the phasing of SANGs.

An initial phase of SANGs will likely be progressed through planning in 2017 to enable implementation in 2017/18, and hence residential occupations by March 2020.
There will be a degree of overlap between each phasing period.

Illustrative timing of the delivery of economic and social/community infrastructure is as follows:

- Temporary retail facilities – 2020/21
- Primary School/ Nursery Provision – from period 2019/20 (or by 500th occupation)
- Local Centre/ Village Centre – 2022/23
- Employment (Phase 1) – 2024/25
- Secondary School – 2023/24 (by 750th occupation, on-site provision or contribution)
- Travellers Provision - 2024/25
- Sports Facilities – 2025/26
- Employment (Phase 2) – 2028/29
- 2nd Nursery – 2028/29

Illustrative timing of the SANGs is as follows:

- Release of Phase 1 SANG (38.7 ha) – 2018/19
- Release of Phase 2 SANG (2.1 ha) – 2026/27
- Release of Phase 3 SANG (8.4 ha) – 2027/28
- Release of Phase 4 SANG (0.7 ha) – 2028/29

A SANGs car park will be operational for the first development occupation (2018/19) accessed from the main site access from Ockham Interchange. This will be via the construction of the first section of ‘Ridgeway Avenue’ main development spine road, to an acceptable standard to allow for initial access/ use. The SANGs strategy is agreed with Natural England.

Changes Sought

The following amendments to draft Allocation A35 are suggested.

Amend the requirement for approximately 100 sheltered/Extra Care homes to be C2 or C3 use.

Amend the convenience retail provision to read 1,200 sq m.

Amend the paragraph with respect to off-site cycle network enhancements, as follows:

"Preserve and enhance the existing off site cycle network from the Land at former Wisley airfield site to key destinations, including cost-effective improvements to a level that would be attractive and safe."

The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be determined.

Amend the bullet point with respect to ‘sensitive design’ as follows:

"The delivery of a new settlement provides an opportunity for distinctive character and unique and quality design. A balance should be achieved to enable a design that meets these principles and is designed with the landscape."

Delete the bullet point with respect to site access/egress.

Delete the requirement for an application level ‘Habitat Regulation Assessment’. This is the role of the Borough Council as the competent authority.

Delete the bullet points which refer to the tenure requirements for the traveller pitches and reference to nil cost. Delete the bullet point with respect to the phasing of the delivery of traveller provision. Include reference to ‘up to’ 8 traveller pitches.
For consistency, delete the bullet point related to “opportunity” as it is not apparent what this means, and no other major strategic site has this bullet point.

For clarity, draft Allocation A35 should be amended to read (Changes in Red):

In addition, the GBLP should include a Glossary, which defines ‘approximately’ as ‘± 10%’.

The overall phasing of the Wisley new settlement should reflect the phasing provided in these representations. This should be within the housing trajectory of the GBLP and associated evidence base.

In respect of the Proposals Map:

• Amend SNCI area. See Appendix 4.
• Adopt a consistent approach towards safeguarded waste sites.
• Refer to the Surrey Waste Plan factually as an outgoing Plan, highlighting that waste allocations and safeguarded sites are likely to change in the Revised Surrey Waste Plan.
• Either remove safeguarded waste sites from the Policies Map or amend the notation on the Map to be factually correct, ‘Surrey Waste Plan 2008 Waste Notation’.

Conclusion

WPI has made a number of representations on the GBLP. This is supported by a range of technical evidence which complements the Key Considerations applicable, notably to support the draft allocation, and respond to the reasons for refusal of the recent planning application (reference 15/P/00012). WPI is in broad support of the GBLP, the planned housing requirement, infrastructure provisions and draft allocation of a new settlement at Wisley Airfield. WPI does however have some technical objections.

In summary WPI has the following principal technical concerns with the GBLP:

• Clarity should be provided in respect of the proposed housing policy (draft policy S2) to ensure that the full housing requirement is outlined in the policy, in addition to a credible phasing of the housing allocations to enable a rolling five-year supply of housing. To enable the objectively assessed needs (OAN), the housing policy must be based on the delivery of ‘at least’ 13,860 dwellings (see Paragraph 3.10 onwards).
• The draft allocation of the Wisley new settlement should be effective and implementable. The proposed SNCI designation over the whole of WPI controlled land is unjustified, and an amendment is suggested (see Appendix 4). It should also be made clear that it is not the purpose of a Local Plan to make waste allocations, and thus the present waste notation is merely reflective of what the present 2008 Surrey Waste Plan includes (see Appendix 6). Further technical concerns are outlined, notably with respect to the convenience retail provision outlined by the emerging policy.
• The delivery of affordable housing should be expressed as a ‘target’. The provision of land at nil land value is un-evidenced and unlikely to be effective (see Paragraph 3.29 onwards).
• The requirement for all development to connect (or safeguard) Combined Heat and Power (CHP) is unjustified and likely to be economically unviable or technically unfeasible. The GBLP should reflect the Housing Standards Review and not repeat or seek to conflict with Part L of the Building Regulations (see Paragraph 3.73 onwards).
• The Sustainability Appraisal (SA) is broadly considered to be robust and soundly prepared. It demonstrates the need for all of the major strategic site allocations (as per Option 4). The SA should be enhanced, to include an accurate description of the Wisley new settlement to be consistent with the Housing Delivery Topic Paper. In addition, a further SA Option which includes the Wisley new settlement as OAN plus 6% buffer (an ‘Option 2A’) should be tested. This would provide additional support to the Local Plan (see Paragraph 2.3 onwards).

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 (11.5 MB)
Executive Summary

- Wisley Airfield represents an exceptional development opportunity for a Sustainable New Settlement. It is the proposed New Sustainable Settlement within Guildford Borough. Wisley Property Investments Ltd (WPI) strongly supports the draft allocation of the Wisley Airfield site for a sustainable residential-led development of a new settlement (draft Allocation A35) within the submission Guildford Borough Local Plan (GBLP) and Focused Amendments June 2017. The key benefits of the proposal are outlined in the Summary Document, included in Appendix 2 of these representations.
- The draft allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will result in the delivery of homes to meet the urgent and pressing needs. The GBLP should move toward prompt adoption which will provide the much-needed framework for the delivery of development.
- Based on the updated ‘objectively assessed housing need’ of 654 dwellings per annum (as identified within the 2017 West Surrey SHMA Addendum), GBC proposes an achievable suite of development allocations, and proportionate amendments to the Green Belt boundary, including new areas of Green Belt.
- The Wisley Sustainable New Settlement can deliver circa 210 dwellings in the next five years of the plan period (2017-2022). This figure has been adjusted to allow for the implementation of the significant green infrastructure provision (Suitable Alternative Natural Greenspace – SANG).
- The Wisley Sustainable New Settlement is an obvious location for growth and, as an assembled site, it is available for immediate development and is capable of making a significant contribution to Guildford’s five-year housing land supply and longer-term provision of housing in the Borough.
- Recognition of the suitability of the site as a location for growth is provided through its inclusion as a “given” for provision of 2,000 new homes in all 8 of the June 2017 Sustainability Appraisal’s (SA) reasonable alternatives. WPI welcomes the revised SA.
- Wisley New Sustainable Settlement would deliver around 7,000 sq m of employment and retail floorspace, potentially accommodating some 1,410 direct or indirect jobs (on top of those employed in the development’s construction) and include facilities to support home working, further reducing travel demand. Additional consumer spending in the local area (excluding housing, fuel and power costs, VAT and leakage), based on 2,000 dwellings, would be around £31.86m per annum. The Gross Value Added from the development would be in the order of £57m per annum.
- The Settlement would complement existing villages, providing additional, well connected local infrastructure including a new primary and secondary school, leisure and health provision. This will relieve the pressures on existing services and amenities, such as schools. The development also incorporates a four form-entry secondary school to meet longer term needs, complementing the two form-entry primary school proposed. The Development directly facilitates the GBLP.
- The Development will contribute positively to the Surrey County Council (SCC) Surrey Infrastructure Strategy (2016) and the Appendix C Infrastructure Delivery Schedule of the GBLP. These benefits of the Sustainable New Settlement have been recognised in the updated SA June 2017, published as part of the Focused Amendments public consultation documentation.
- The vision for the Sustainable New Settlement remains as that submitted with the 2016 GBLP representations. The Wisley Airfield site would be a sustainable, successful place that promotes wellbeing, developed by understanding what people need from the places where they live and work. The proposals engender social sustainability by combining design of the physical realm with design of the social world – infrastructure to support social and cultural life, social amenities, systems for citizen engagement, and space for people and places to evolve. The sustainable communities created would meet the diverse needs of existing and future residents, their children and other users, contributing to a high quality of life and providing opportunity and choice.
- The Sustainable New Settlement would also enable the delivery of significant SANG. The SANG Strategy supporting the planning application was developed in liaison with Natural England, who have no objection to the new settlement. Evidence in respect of the delivery of SANG was produced with WPIs June 2016 representations to the Guildford Local Plan: Strategy and Sites Consultation.
• WPI’s only significant concern with the GBLP is the proposal to designate the entirety of Wisley Airfield as a Site of Nature Conservation Importance (SNCI). This is simply not justified by the available evidence, and fails to disregard the large areas of agricultural or previously developed land on the site. In addition, a concern is maintained with respect of the Proposals Map notation of the present Waste designation on part of the site.
• WPI advances other relatively minor objections with respect to certain other draft Development Management policies.

1. Introduction

1.1. This Representation has been submitted by Wisley Property Investments Ltd (WPI) as part of the consultation on the emerging Guildford Borough Local Plan: Strategy and Sites (Proposed Submission Version, June 2017) (‘GBLP’). The key benefits arising from the promotion of land at Wisley Airfield for a Sustainable New Settlement are outlined within the Summary Document (Appendix 2).

1.2. The Representation highlights, and where necessary expands, upon representations submitted by WPI to the Strategy and Sites Proposed Submission (June 2016) and specifically addresses the focused amendments made to the GBLP. Some of these original representations are withdrawn owing to changes to circumstances.

1.3. Full background to the site was provided within the June 2016 representations (summarised in Appendix 1) and is not repeated here. The key factor to note however is that WPI is the majority landowner within draft Allocation A35. Wisley Airfield comprises circa 115 hectares (ha), of the circa 132 ha allocation. WPI has been in liaison with agents for landowners who control land at Bridge End Farm to the south. It is understood that this land is also available for development as confirmed by representations submitted by CBRE in July 2016. This land is not presently in the planning system, whereas the WPI land is, being subject to an ongoing S.78 planning appeal. The illustrative masterplan which is being considered at the planning appeal has regard for the emerging GBLP allocation, and is facilitative and non-prejudicial on the wider allocation.

1.4. In addition, full technical justification for the proposed new settlement allocation at Wisley Airfield (draft policy A35) was included within the June 2016 representations. This fully demonstrated that the proposed allocation and removal of the site from the Metropolitan Green Belt is fully justified, and will deliver homes to meet the urgent and pressing needs.

1.5. This representation is structured in the same order as the Submission GBLP and specifically addresses the published focused amendments. The first section of this representation sets out a summary of what is understood to have been included as focused amendments. This specifically relates to the matters raised in WPI’s representation in June 2016, and the recommended changes to policy and associated text. A table setting out the summary of the key comments as updated by this representation on the Focused Amendments is included at Table 3.1.

1.6. Following this, a table is produced to provide WPI’s comments and representations on these specific focused amendments.

1.7. WPI is in broad support of the GBLP, and is supportive of the overall provision of housing now proposed. WPI only has a few outstanding technical objections to the GBLP. These are outlined in Table 3.1, with some of the reasoning for certain objections outlined in Section 4:

- The proposal to designate the whole of the WPI land within the proposed allocation as an SNCI has no basis, and does not reflect the available evidence base. The overall policy framework in the emerging GBLP would still permit development on SNCI designations. Notwithstanding this, the requirement in evidence to justify the development on proposed SNCI at Wisley Airfield already exists (see the Environmental Statement and associated SNCI evidence submitted with the planning application / appeal). On this basis, the proposed SNCI designation is simply unjustified, and should be removed from the emerging GBLP.
- The delivery of affordable housing should be expressed as a ‘target’. This change was proposed in our June 2016 representations but has not been made. Instead, GBC proposes that “at least” 40% affordable housing is provided. A new requirement for sums in lieu of on-site provision has been added. In the absence of reference to viability, the policy is unlikely to be effective. This suggestion is made to assist the sound production of the
plan. It must be noted that WPI intends to provide 40% affordable housing as part of the draft Section 106 being considered at the forthcoming planning appeal.

• The requirement for all development to connect (or safeguard) Combined Heat and Power (CHP) is unjustified and likely to be economically unviable or technically unfeasible. The GBLP should reflect the Housing Standards Review and not repeat or seek to conflict with Part L of the Building Regulations.

• The GBLP should not look to incorporate outdated Minerals and Waste data and therefore should remove specific reference in the Proposals Map to Safeguarded Waste Sites which are part of the Surrey Waste Plan 2008.

• The Sustainability Appraisal (SA) as updated in June 2017, continues to refer to the site as having a medium sensitivity. However, this does not accurately reflect the findings of the Green Belt and Countryside Study 2013 (GBCS) that classified the sensitivity as “low to medium”.

• With specific regard to emerging policy A35, WPI remains in support of the proposed allocation of Wisley Sustainable New Settlement within the GBLP. However, there remain concerns regarding the anticipated retail provision, which does not accurately reflect the evidence base. As part of the pending appeal at Wisley Airfield GBC has withdrawn its objection to the development on the basis of the level of convenience retail provision proposed. This was on the basis of the Commercial Assessment produced by Savills on behalf of WPI and appended to the July 2016 representations to the Emerging Local Plan (Appendix 7). This report demonstrated the level of need for A1 use class space associated directly with the proposed development of Wisley Airfield, and set out the considerable benefits that would arise to the new community. Subsequently, the evidence clearly shows a need for a higher provision of convenience retail space at the Wisley New Settlement and policy A35 should suitably reflect this. GBC has not changed the proposed provision from 600sqm which as evidence demonstrates, will not be sufficient to meet the need. Subsequently, this aspect of the policy remains unjustified.

• In addition, there has been no amendment to the requirements for tenure of traveller pitches, nor has “up to” been included in relation to the number of pitches that are to be provided. Notwithstanding this, it is highlighted that the new settlement application does make provision for 8 pitches.

4. Specific Commentary as Additional Representations on the Focused Amendments

4.1. Section 3 provided an update on WPI’s position on the GBLP as it stands (the Regulation 19, 2016 version with 2017 Focused Amendments). This Section 4 provides specific commentary on the SNCI issue (as supported by Appendix 3) and also with respect of emerging Allocation A35 and the Proposals Map.

Wisley Airfield Allocations - Designation of the Wisley Airfield as a Site of Nature Conservation Importance (SNCI)

4.2. Clarification Requested (Objection maintained).

4.3. The Proposals Map and allocation for Wisley Airfield continues to include the land as a Site of Nature Conservation Importance (SNCI) and this is wholly unjustified.

4.4. Part of the site is currently designated a SNCI, and feature of County value. This is accepted by GBC in the Draft Policy Allocation A35 and was originally designated for its assemblage of rare plants.

4.5. Surrey Wildlife Trust (SWT) has long argued that this designation be extended to include the whole site on the basis of bird, and herpetofauna records recorded during surveys between 2004-2007. In their planning application advice to GBC, and in their report to the SNCI review panel, SWT has incorrectly referred to this ‘recommended boundary revision’ as a ‘designated boundary’. WPI has always contested both the boundary extension itself, and SWT’s position regarding the status of the recommended boundary revision.

4.6. In the GBC document ‘Sites of Nature Conservation Importance Surveys 2004-2007 (2007), GBC confirm their position: “The changes to SNCIs including boundary changes to existing SNCI, deleted SNCI and new SNCI, will in the longer term, be fed into and be formally adopted through the GDF process by way of the Site Allocations DPD and identified on
the GDF Proposals Map(s).” “In the interim period, the recommended alterations have been mapped on the Council’s GIS with a note that “this data is a proposed revision to the SNCI boundaries shown in the GBC Local Plan 2003.”

4.7. WPI has continued to object to the boundary change and resultant increased size of the SNCI designation of the Wisley Airfield throughout the local plan process, on the basis of the lack of evidence supporting or justifying the designation.

4.8. As evidenced in Appendix 4 of WPI’s representations made in July 2016, extensive ecology surveys of Wisley Airfield have been undertaken between 2006 and 2016. This provided, and continues to provide, the most accurate and updated date ecology evidence for the Airfield. The results were reported in the ES accompanying the planning application for the Airfield and within a technical note produced to inform the Surrey Local Sites Partnership SNCI Review (Annex A of Appendix 3), which was also shared with GBC.

4.9. In addition, WPI’s appointed ecologist accompanied SWT during their update botanical surveys at the Wisley Airfield, including Wisley Field SNCI on four occasions in 2016, also collecting botanical data as summarised in the technical note supporting the July 2016 Representations (Appendix 4).  

4.10. The up to date evidence available clearly demonstrates that there are only some areas within the wider Airfield site that have the potential to qualify for an SNCI designation, and that the vast majority of the Wisley Airfield has a limited nature conservation interest, not supporting features that could be considered as meeting the SNCI qualifying criteria. The proposed designation as shown on the Proposals Map and Allocation Map for Wisley Airfield, is based on out of date evidence that has been superseded and cannot therefore be considered sound. Its inclusion as part of the Plan fundamentally puts the site at risk of being considered undeliverable, which risks the soundness of the Plan at examination.

4.11. Further evidence and commentary on this matter is contained in Appendix 3, a report prepared in response to the proposed designation by WPI’s appointed ecologist, Ecological Planning and Research Ltd (EPR).

Changes Sought:

4.12. The proposed designation of the Wisley Airfield as an SNCI should be corrected to appropriately reflect the up to date, site specific evidence that is available as undertaken between 2006 and 2016 (inclusive).

4.13. The GBLP proposals Map should be updated to show the amended SNCI boundary to reflect the EPR’s proposal map at Appendix 3, Annex A, Map 1.

Wisley Airfield Allocation – Policy A35 & Proposals Map


4.15. Wisley Airfield is allocated through policy A35. It is positive to see that the table of sites provided onwards of page 141 of the GBLP now refers to the “gross” number of dwellings (approx.) to be provided “over the plan period”. This acknowledges that some sites may be capable of contributing to additional development delivery beyond the plan period, although WPI fully appreciate that this has not been explored by GBC.

4.16. With respect to the changes made to policy A35, WPI is, in the main, supportive, and welcomes the changes that are proposed by the Focused Amendments. However, some objections are maintained. Specifically, WPI strongly believe that there should be a definition of “approximately” included in the glossary. For clarification purposes, this should make it clear that approximately is plus or minus 10%. Whilst this may only appear as a minor addition, the additional clarity provided will help secure the soundness of the plan and ensure it is appropriately interpreted after adoption.

4.17. Policy A35 allocates 8 Gypsy and Traveller pitches at Wisley Airfield. This should be amended to state “up to 8 Gypsy and Traveller Pitches”. In addition, parts 14 to 20 (inclusive) refer to the tenure of the pitches, and that these should be provided at “nil cost”. Both paragraph should be deleted. The matter was covered in our previous representations on the GBLP. The reason being to ensure plan effectiveness and flexibility.
4.18. With the exception of these amendments, WPI fully supports the proposed policy allocating Wisley Airfield. All other objections previously raised to the policy are now withdrawn.

Proposals Map:

4.19. Clarification Requested (Objection maintained).

4.20. WPI continues to raise a technical concern with respect of the ongoing recognition / designation of a waste allocation on the Proposals Map, within the designation for a new settlement. This is not the role nor purpose of a local plan.

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5. Conclusion

5.1. WPI has made a number of representations on the GBLP following the publication of the focused amendments, June 2017. These representations update WPI’s position.

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<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>
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<tbody>
<tr>
<td>Site Allocations – Wisley New Settlement – Proposals Map</td>
<td>Amend SNCI area. See Appendix 3 Adopt a consistent approach towards safeguarded waste sites. Refer to the Surrey Waste Plan factually as an outgoing Plan, highlighting that waste allocations and safeguarded sites are likely to change in the Revised Surrey Waste Plan. Either remove safeguarded waste sites from the Policies Map or amend the notation on the Map to be factually correct. ‘Surrey Waste Plan 2008 Waste Notation’.</td>
<td>Amendment to the Proposals Map. Retained proposal to designate whole site as an SNCI. No change to reference of Safeguarded Waste Sites.</td>
<td>Objection maintained in relation to SNCI area. Objection maintained in relation to waste. The Local Plan should not be covering outdated Minerals &amp; Waste matters. This is a matter for Surrey County Council. Further commentary on this representation is provided in Section 4.</td>
</tr>
<tr>
<td>Policy A35 (Wisley New Settlement)</td>
<td>Amend the requirement for approximately 100 sheltered/ Extra Care homes to be ‘C2 or C3’ use. Amend the convenience retail provision to read ‘1,200 sq m’.</td>
<td>(Pages 225 to 227). Varied changes have been made to the policy. This includes an amendment to say “C2 Use” only. No change to amount of convenience retail provision. This still reads</td>
<td>WPI welcome the clarification regarding “C2” uses. Objection maintained in relation to retail provision. This does not</td>
</tr>
</tbody>
</table>
Amend the paragraph with respect to off-site cycle network enhancements, as follows:

"Preserve and enhance the existing off-site cycle network from the Land at former Wisley airfield site to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade and Ripley, with including cost-effective improvements to a level that would be attractive and safe for the average cyclist."

The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be ‘determined’.

Amend the bullet point with respect to ‘sensitive design’ as follows:

“The delivery of a new settlement provides an opportunity for distinctive character and unique and quality design. A balance should be achieved to enable a design that meets these principles and is designed with the landscape.”

Delete the requirement for an application level ‘Habitat Regulation Assessment’. This is the role of GBC as the competent Authority.

Delete the bullet point with respect to site access/egress and flood risk mitigation – this matter will be addressed in the application FRA.

Delete the bullet points which refer to the tenure requirements for the traveller pitches and reference to nil cost. Include reference to ‘up to 8 traveller pitches’. In addition, the GBLP should include a Glossary, which defines "approximately" as ‘±/- 10%’.

The overall phasing of the Wisley new settlement should reflect the phasing provided in this Representation. This should be within the housing trajectory 600sqm. There focused amendments do not change the policy wording as requested with regard to removal of Effingham Junction, Horsley and Ripley. Instead, the policy includes an additional location - “Byfleet”.

The policy wording is charged to “determined” in relation to assessment of secondary education needs.

The paragraph on “sensitive design” has been removed and replaced with a new section under “other issues” (para 22).

The requirement for an application level HRA has been removed from the policy (see p226).

Paragraphs relating to access and egress have been deleted (p226). The flood zone comments have been moved to “other issues” at para 21.

The requested changes relating to tenure and traveller pitches have not been made.

No definition of “approximately” has been added to the glossary.

A new section has been added on “opportunity” and two bullets are included relating to creating unique places and incorporating high quality architecture.

It is also noted that there are two new paragraphs relating to the existing Air traffic beacon at Wisley airfield (8) and supporting infrastructure including GP and community building (9).

WPI support removal of requirement for an HRA.

WPI support and welcomes the change regarding access and egress.

Clarification Requested (Objection is maintained) in relation to tenure and traveller pitches, notwithstanding the fact that the new settlement application makes provision for 8 no. new pitches.

Clarification Requested. Definition of “approximately” as requested by WPI would provide additional plan clarity.

The new section on opportunity is a Welcome change.

Welcome clarification of the infrastructure requirements and planning requirements.

Further commentary on this representation is provided in Section 4.
of the GBLP and associated evidence base.

For consistency – delete the bullet point related to ‘opportunity’ – as it is not apparent what this means, and no other major strategic site has this bullet point.

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6126</th>
<th>Respondent: 9096321 / G McCoat</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I OBJECT

To the planning on the Wesley Airfield site

Again no infrastructure: Transport?

No regular busses to take people to the only 2 train stations near by, being Horsley or Effingham, which are both totally unsuitable for thousands more commuters either from the Wisley site or from the Horsley proposed sites.

These train stations are small and serve the villagers at the moment, but could not accommodate thousands more commuters.

The Wisley site needs busses to take the population to Guildford, Cobham.

They would need a Doctors Surgery, schools, junior and senior as all the local schools are over subscribed in the surrounding areas.

<table>
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<tr>
<th>Comment ID: PSLPS16/2877</th>
<th>Respondent: 9101985 / . Roberts</th>
<th>Agent:</th>
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<td>Document:</td>
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<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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.

- I object to the detrimental impact on transport, local roads and road I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
2. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
3. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
4. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

1. The lack of suitable public transport stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7839  Respondent: 9228769 / Cathryn Fleming  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) Inclusion of the Wisley Airfield and the 2000 plus homes etc

Despite being unanimously rejected earlier this spring, this proposal has reappeared. WHY? With what justification? The following issues simply have not been addressed since it was turned down. Why then include it?

Impact on the Local Area

* The additional 5000 residents is the equivalent of doubling the populations of both Horsleys.

* The density is out of keeping with the local area and will change its nature forever. 

* The impact on light pollution, traffic and infrastructure has been GRAVELY UNDERESTIMATED and proposed mitigation measures are totally inadequate. The developers are completely arrogant in their estimation of the following:

  1. Everyone in the development will commute by train from Woking or drive on the A3. Why? Have you ever tried to drive from Ockham to Woking during the morning commute and/or park? It will take 25 minutes at a minimum and create huge congestion in Ripley, Byfleet and Woking

Why will they not then not go to East Horsley or Effingham which are less than 5 or 3 minutes drive from the proposed development? Of course that is where they will go - the developers do not want to state this as the implications are not favourable to them.

Have you been to visit these train stations? There is NO SPACE at East Horsley for additional parking expansion and to do so in Effingham will mean confiscation of land and a further impact on the Green Belt.

This issue also reflects the FACTUAL ERRORS in the documentation that state there are 9 stations within 5 miles. In fact this is only as the crow flies not as Surrey roads exist. ONLY EFFINGHAM AND EAST HORSLEY ARE WITHIN 5 MILES by usable road of this development.

The fact that the developers are already planning that a new double mini roundabout to be installed at the junction of Forrest Road and Effingham Common Road indicates that they themselves know the residents will go to this station but are unwilling to acknowledge it as it does not help their case.
1. The developers claim no impact on Cobham/Downside as everyone will do their local shopping in the new shop(s). REALLY? 2000+ homes from a convenience store? There is a small mini budgens in East Horsley and one convenience store in Ripley. **These 2000+ homes will be shopping at the Sainsbury’s and Waitrose in Cobham and use all the other local facilities there (banks, opticians, dentists etc).** They are simply not going to drive to Merrow or Guildford to do their local shop and there is only a very small car park in East Horsley which offers limited facilities in terms of shopping. This will severely strain traffic and resources in Cobham/Downside. Yet there has been no consultation with Elmbridge.

1. Lack of Local secondary schools. It is very nice they want to add a primary school but where are these kids going to go afterwards - and who is going to fund this school in the longterm? As the Headmaster of Howard of Effingham has stated - that even if it is expanded, there will be no places for children from this development. As it is East and West Horsley residents find it nearly impossible to get into the Howard. There is a severe shortage of secondary places throughout this area and absolutely no plans for a new school. Are they assuming everyone will go private? **Again the lack of consultation with other districts over this issue (Mole Valley, Elmbridge, Woking) is unbelievable.**

1. All of this additional traffic will have a huge and non reversible impact on the historic houses and other buildings in Ockham, Ripley, Downside and the Horsleys.

1. The short term closure (5 years!) of a number of roads will have a huge impact on EVERYONE who lives in the Horsleys, Ockham, Ripley, Downside etc.

* Flooding has not been adequately assessed. No study has been done of the impact on the water table and flooding in the area. This could have a huge impact and also affect the RHS at Wisley.

**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: PSLPS16/7840</th>
<th>Respondent: 9228769 / Cathryn Fleming</th>
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**Inclusion of the Wisley Airfield and the 2000 plus homes etc**

- All sites that are dependent on the use of the private motor cars cannot be considered sustainable.
- The proposed public transport provision is unrealistic given the nature of the roads in question and the level of congestion in the neighbourhood. Moreover given cutbacks by Surrey Council for budget constraints should not be planned upon.
- The thought that residents will walk or cycle to the train stations on narrow, unlit country lanes that do not have pavements is **beyond ridiculous.**
- **Parking, as stated above, at the two nearest stations is already at capacity.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7841</th>
<th>Respondent: 9228769 / Cathryn Fleming</th>
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Inclusion of the Wisley Airfield and the 2000 plus homes etc

- A number of factual errors exist in the documentation - i.e. that Natural England has not agreed to SANG provision.
  - _The misrepresentation stated above with respect to train stations._

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7842  Respondent: 9228769 / Cathryn Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Inclusion of the Wisley Airfield and the 2000 plus homes etc

- The housing need in Guildford has not been determined
- No consultation with surrounding boroughs who are also objecting
- The site is not deliverable within 5 years due to problems with sewage and water capacity as outlined by THAMES Water and the OCK DVOR air traffic control beacon situated onsite which limits development and which is still operating
- No very special or exceptional circumstances exist
- There are alternative ways to increase housing by using infill sites in the area
- The proposal includes the site safeguarded for waste under the Surrey Waste Plan which Surrey County Council refused to give up in their response to the Draft Local Plan in September
- The site is not listed for development under the existing 2003 Local Plan.
- There is not enough land to provide a sustainable community based on your own (GBC’s) parameters
- Surrey Police have concerns on their ability to manage the proposed population density

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6051  Respondent: 9237953 / Patricia Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to build on the former Wisley Airfield site. This has very recently been unanimously turned down by the Borough Council on 14 different counts and should be removed from the Local Plan permanently.

My specific objections to the Former Wisley Airfield development are as follows:
1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

3) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4) 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.

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also OBJECT to the inclusion of the Three Farms Meadows proposal in the plan, for all the reasons I gave in my last letter. The changes that the developers have since proposed do not alter the case against the development in any way. Why is this site still included, when another, more suitable, has been removed? The local infrastructure cannot support this development, the roads are already very congested, the M25 Junction 10 is already a daily major problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1400  Respondent: 9241921 / Rex Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy A35 / Land at former Three Farms Meadows, Ockham

I object to this policy.

A chorus of public outcry resulted in Guildford Planning Committee, in April 2016, unanimously rejecting a planning application for this development on 14 separate counts.

Following this rejection, many residents believed that this application was on ‘hold’ until the developers reassessed their proposals. Evidently, the electorate where mistaken as GBC have again, inserted this proposal into the draft Local Plan.

Owing to the concrete runway, the site is being misrepresented as brownfield, when in fact, only a small area of the over-all site where the hangers were previously situated, is actually brownfield. The majority of the site area is currently designated as Green Belt and should remain as such.

Again, under section 9/87 of the NPPF, this proposal does not demonstrate ‘exceptional circumstances.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/448  Respondent: 9244641 / Peter Cordrey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to Guildford Local Proposed Plan and inclusion of plan of Former Wisley Airfield , now known as Three Farms Meadows (TFW)
I have lived in Ockham for over 34 years and am very concerned and object to the inclusion of the TFM. My objections are on the following basis:

1. The GBC planning Committee unanimously rejected the planning application this year.
2. The land is to be protected by the green Belt policy.
3. The village suffers very badly with water flooding and the new proposed houses will make this even potentially worse.
4. The development will increase traffic in the village and A3 to a level that will cause potential grid lock and increased accidents.
5. The village does not have sufficient infra structure to support the new houses and traffic. Including railway parking that is currently at full capacity at Effingham junction station.
6. The proposal has blighted the village and marketability of existing homes.
7. The development will have adverse consequences and health and safety concerns with pollution including increased unacceptable noise levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2790  Respondent: 9299745 / Simon Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The West Horsley issues I object to are as follows:

- The council is not choosing to constrain its housing growth in Green Belt areas and the proposed developments still represent a large number of dwellings on Green Belt space, which was established to prevent urban sprawl not facilitate it. The continued submissions of the Local plan squarely fail to meet any of the infrastructure issues and relies on inaccurate information and excessive erosion of Green Belt land.

- I question the Council’s predictions for Guildford’s level of growth which is 25% more than the Office of National Statistics prediction for the area by 2034. Surely it is an error to base a plan on figures that differ so markedly from national forecasts and flawed evidence must not be relied upon to justify the inflated predictions.

- Nothing has been proposed since last years Consultation to improve sustainability of the West Horsley development sites and therefore meet the National policy requirements. The road network is already over used, in poor state, is prone to flooding in poor weather. The train station carparks are already full up at rush hour. The primary and secondary schools in the area have both applied for expansion to meet existing needs and these have been rejected. I therefore do not understand how an infrastructure that is over subscribed already can fit the further demand expected of 400 new homes in the area. The same applies for the Doctors surgery which is at capacity.

- I object to no changes being proposed since the 2016 consultation to insetting West Horsley from the Green Belt and welcome the reduction in the number of new homes being proposed, but the Local Plan does not go far enough to maintain Green Belt land.

- The number of proposed dwellings will fundamentally change the character of the village, yet Guildford town centre and brownfield sites appropriate for dwellings are being overlooked in preference for further retail space when many published studies show online retailing is growing at the expense of the high street.

I object to the Three Farms Meadows site proposal because:
- There are severe constraints with the A3 and M25, one of the most congested areas of road at one of the busiest motorway junctions in the country.

- Local road networks cannot sustain a development of that size with roads prone to flooding in poor weather, buses and lorries in Horsley do not have enough room to pass cars without them stopping or in too many instances, mounting the pavement.

- There is not enough employment opportunities on the site for a development of that size which will only lead to more cars and commuters adding to the severe congestion, because of this it is inappropriate to assume that the local roads will be fine for cycles instead. The roads are poorly lit, not big enough, in poor repair so cyclists who do use them often have to cycle further from the kerb for their own safety than the Highway Code recommends.

- The proposed removal of over 3 hectares of Green Belt has been included without justification.

- The significant modifications made to the plan mean that it should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

- The evidence base especially the West Surrey SHMA and the Guildford addendum 2017 has been challenged by other experts including NMSS.

Please consider the following in addition to the objections I have already raised regarding both these developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5273  **Respondent:** 9335041 / David Reeve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I OBJECT** on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

**I OBJECT** that the proposal is unsustainable in terms of its location (almost everyone will be a car user).

**I OBJECT** that the proposal is unsustainable in terms of its impact on traffic – both on the trunk road network and the local road network.

**I OBJECT** that the proposal is inappropriate in terms of the local noise and air pollution.

**I OBJECT** on the grounds that (in conjunction with other sites) this proposal would lead to – or certainly facilitate – an almost continuous ribbon of development along the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/147  **Respondent:** 9557825 / Richard Powell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I OBJECT** on the grounds that the scale of development in the borough is unsubstantiated (see sections 1.1 and 1.2 above).

**I OBJECT** that the proposal is unsustainable in terms of its location (almost everyone will be a car user).

**I OBJECT** that the proposal is unsustainable in terms of its impact on traffic – both on the trunk road network and the local road network.

**I OBJECT** that the proposal is inappropriate in terms of the local noise and air pollution.

**I OBJECT** on the grounds that (in conjunction with other sites) this proposal would lead to – or certainly facilitate – an almost continuous ribbon of development along the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I’d like my comments below to be taken into consideration for the GBC local plan:

Site A35 / Wisley Airfield

1. I object to this proposal. I objected to this site in 2014 and my views are unchanged. This is a significant development which is not appropriate for the area. It is a greenbelt site and should be kept as such. I find the plan to build 2000 houses is unacceptable and completely at odds with surrounding land use.
2. In addition such a huge volume of housing will add to the already significant access issues to the M25 / J10 and A3. It would also create unacceptable traffic congestion / “rat runs” on the surrounding minor roads.
3. I am very concerned about how local services from education to healthcare could cope with such a large additional population in the area. I question whether this has been properly taken into account and incorporated into the GBC plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1166  Respondent: 9577857 / Nick Wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

I continue to object to this development. I have detailed my objections previously to cover;

- loss of local amenity to surrounding villages and visitors - green spaces, space to breathe
- loss of semi-rural character to surrounding villages and the county - countryside, undeveloped locations
- saturation of local transport services (roads, trains, buses) for the current population by new residents - the roads are insufficient (size, layout, character) to deal with the increased volume of traffic which will be produced; there are no footpaths adjacent to majority of the roadways to encourage walking / cycling; train carparks are already full
- saturation of existing services (clubs, shopping, education, health) for current population by new residents - health services are over-subscribed, schools are full, clubs maintain waiting lists; shops are large enough for the current populations but not for new developments - more people means larger shops, means more traffic, means more urbanisation
- permitting the development will mean the precedent will be introduced which will reduce ability to object to future development in the locality, encouraging and permitting infill development between and around the existing villages (Ockham, Ripley, Horsleys, Effingham, Wisley)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8174  Respondent: 9603457 / warren wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I support a new community at Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6910  **Respondent:** 10326081 / Ian Wilkinson  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are no exceptional circumstances to justify this blatant assault on the green belt.

To maintain that the site is actually brownfield and not green belt, constitutes a mis-representation.

If allowed, this proposal would devastate the village of Ockham and nearby villages of Ripley and the Horsleys.

There is absolutely no precedent to destroy the existing tract of quality farmland in the green belt.

Agricultural land is very important; priorities and the food supply may change in the years ahead.

The land forms an important barrier between Cobham and Ockham & Ripley and an inevitable inexorable sprawl of urbanisation would inevitably follow if this appalling idea were to see the light of day.

The proposal is not sustainable, there is insufficient land available.

The site is adjacent to an area of outstanding natural beauty (AONB).

The road network is inadequate, not to mention loss of good farmland and natural habitat.

I strongly object to the the proposed green belt developments at Wisley Airfield, West Horsley, East Horsley, Send, Send Marsh, Garlic Arch (A43).

The consequences for these villages would be profound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/4059  **Respondent:** 10337569 / Adrienne Lawrence  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I, like him, am fed up with the time the Council forces us to expend on this exercise and I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I reserve my right to appear at the inquiry and present my evidence.

I am a very busy grandmother and do not have the time he has to sort out point by point so generally I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the RHS at Wisley where visitor numbers will increase by 500,000/annum and the associated traffic increase from the RHS has not been taken into account nor the fact that 1000’s more visitors appear for special events several times a year and the resultant traffic has not been taken into account.

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

Opportunity (3) should be common to all sites and is not unique to this site

I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
I object to the removal of additional 3.1 ha from the green belt without any justification.

I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

I object topara 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In summary I again object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford or into Effingham, East Horsley or either of the nearby stations will have to negotiate the over-crowded SRN, will be an unreliable service for potential customers but more important dangerous on such small narrow over crowded lanes. Furthermore there is insufficient parking available at East Horsley or Effingham to accommodate the additional population that will need to commute either to London or into Guildford using the rail service.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe. This infrastructure is simply not there to support this.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

- The associated traffic increase from the RHS has not been taken into account.
- The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

Whenever there is an event on today, the traffic is at a standstill already

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station, Effingham or East Horsley

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

Opportunity (3) should be common to all sites and is not unique to this site

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.
I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

I object to the removal of additional 3.1 ha from the green belt without any justification. Green belt is supposed to be PROTECTED!

I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact and is PROTECTED green belt land!

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge. Junction 10 of the M25 / A3 is already above the legal air quality limits. As I have 2 asthma sufferers in my household this is extremely important to us particularly as a family.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

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.

I consider for the reasons listed above, yet again, this plan is unsound and not fit for purpose. I object to this 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 site A35 Wisley Airfield – 2000 homes that are totally inappropriate and unsustainable development in the Green Belt. This is a hugely disproportionate amount of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings and the development of up to 600 houses in East Horsley

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor.
stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow roads in Ockham, East Horsley and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25, specifically around junction 10 of the M25 and the A3 Guildford bypass. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities. We moved to East Horsley to enjoy living in the countryside not in an overpopulated urban sprawl.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to the draft local plan. I see that although the application for a development of over two thousand houses on and adjacent to Wisley Airfield (a New Town) was well and truly rejected, it is still on the draft plan. The idea of what is virtually a new town on the Green Belt of Surrey's countryside is appalling. The object seems to be to turn the beautiful Surrey Green Belt into one vast conurbation. The Green Belt areas were left as green 'lungs' between conurbations and were to be sacrosanct. It seems that there is no interest in 'brownfield' sites, maybe because they are more expensive to develop. It now appears that it is proposed to take three villages out of the Green Belt. (including Ripley, a charming small 'English' village, where I live). This would defeat the object of the Green Belt.

Apart from the issue of the Green Belt, there is also the issue of overcrowding of the narrow country lanes (I live on a lane where two cars cannot pass) and the consequent bottlenecks and gridlocks in local Guildford and on the A3 at busy times. It would appear that The 'Local Plan' would seek to increase the housing and business supply by 25 per cent over the next 15 years. The occupiers of any new properties would doubtless have two cars and add to the chaos. The infrastructure will not bear any further burdens. The local bus service is being reduced, the local Secondary Schools are already fully subscribed. It would seem that taking these three small country villages out of the Green Belt would only add to the danger and disruption of this already busy countryside. Please be guided by the people who live in the surrounding areas and let us keep our Green Belt!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT TO development of Wisley Airfield. This site is not and never will be suitable for the proposed new town of 2,000+ houses and 4,000+ vehicles. A3 is already working at full capacity with tailbacks at peak times. The site falls between three junctions M25, Cobham and Ripley causing traffic chaos. No adequate public transport the two local railway stations already over subscribed. Combined with narrow lanes the whole area would be turned into a traffic disaster. Air pollution, no adequate infrastructure makes the whole plan a non starter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/489  Respondent: 10569473 / Laura Gold  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Supportive of public tenure pitches as it is easier and provides a level of control.
Support that GBC allocate and manage the pitches as it ensures fairness and tenure security. Support inclusion of garden provision and softer landscaping.
Utility blocks are necessary as no one will want to live somewhere without a utility block and the site will end up being a transit site No facilities of space within a mobile home for washing facilities. If a family could afford a unit with wash facilities, it is likely they would be on a private site anyway.
Strongly support the need for inclusion and breaking down of barriers, particularly for the children.
Agree with softer landscaping to resist isolation.
If outhouses or utility blocks are not including, outbuildings will be built anyway.
Support phasing of the sites .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/494  Respondent: 10569473 / Laura Gold  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Good to see more secondary schools, particularly of smaller sizes.
Support park and ride opportunities . Would like to see more community facilities in local areas as currently cannot do anything without a car.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Good to see more secondary schools, particularly of smaller sizes.

Support park and ride opportunities. Would like to see more community facilities in local areas as currently cannot do anything without a car.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the large proposed developments at Site'A35)2,000 houses at former Wisley Airfield (already rejected by GBC), Site A25 - 2,000 houses at Gosden Hill Farm and the 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
A35 Land at former Wisley Airfield

Comment: I have objected before to this development as I consider this proposed development to be a contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley and its infrastructure. It will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/773  Respondent: 10617441 / Graham Sykes  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/776  Respondent: 10617569 / Lydia Sykes  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/3606  **Respondent:** 10617569 / Lydia Sykes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is my assessment that the submission plan is unsound due to the number of errors in the plan, the poor quality and the lack of transparency in the evidence base, including the fact that large files have also been used again which are not compatible to those of us with poor internet connection. There is also a considerable lack of clarity.

I am writing to confirm my continued objection to the inclusion of A35, Three Farm Meadows in the draft Local Plan for the reasons as given below:

- It is the least sustainable site in both this and previous versions of the plan because of the constraints on the site and the physical location.
- It is further away from any railway stations than any other identified strategic site.
- It is adjacent to one of the most congested stretches of strategic road network in the country (ie M25 Junction 10)
- Local road are already at capacity particularly when there have been any incidents thus making the SRN not free flowing.
- Public transport is already having to negotiate the overcrowded SRN and is therefore unreliable and subject to frequent delays.
- It is also adjacent to one of the most popular visitor attractions in the south-east, the RHS at Wisley which attracts huge numbers. Any regular events which take place several times per year already result in extra traffic chaos and I feel this has certainly not been taken into account.
- There is insufficient employment available on site so that all residents will have to travel to work. It is unrealistic to assume that people will walk/cycle on narrow local road on a regular basis.
- I also object to any changes within the green belt boundaries.
- I also object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultants.
- I wonder and object to the fact that there has been no clear explanation why the council think it appropriate to have a regulation 19 consultation when the changes are major and needs to be based on the totality of the plan rather than the proposed changes.
- I object to the inclusion of A35 as it will not contribute to the 5 year housing projection due to constraints notably in the provision of sewage capacity
- I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
- I object to a 10% inclusion buffer in the housing number over the plan period as it totally unnecessary.
- I object to the transport evidence base including the SHAR 2016 Highways assessment report which has already been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
• I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
• I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBSPA etc. I believe that the housing number is unsound and open to legal challenge.
• I object to the apparent disregard for the impact of in-combination development on the THSPA, particularly damage caused by nitrogen deposition and high pollution levels.
• I object to the differences in the housing figures set out in the Annual Housing Target table. Another glaring example of why the plan is not sound.
• I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I also object to the reliance of the Carter Jonas study update 2017 which includes “demand” for retail space from companies that are already in administration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2912  Respondent: 10623873 / Andrew and Ruth Sandilands  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are writing to say we strongly don’t want any houses being built at Wisley Airport and proposed sites near Ripley. The traffic up and down Newark lane is terrible and very dangerous, so we don’t want more houses built at the proposed sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1518  Respondent: 10624129 / M Arnold  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I particularly wish to emphasise the danger posed by an additional 2000 homes at the old Wisley airfield site will add significantly to the existing horrendous traffic problems at the A3/M25 junction during the rush hours.

I hope you will find it helpful if I explain that no amount of fiddling around with the access to the A3 will resolve the problem of say an addition 3000 cars joining the A3 so near to the M25 junction.

In any event, there is no local requirement for additional housing in the area whereas there is a considerable desire to retain the green belt as it is without interference from outsiders who have no interest in the area.

I thought the point of having a ‘consultation’ was to listen to what people are saying and to act on the feedback. You seem to have very largely ignored what almost all people have said.
You seem to ignore the fact that there are already too few doctors in the area, too few teachers and no demand for additional shops/retail development. There are many care homes and sheltered developments in the area.

You seem to totally ignore the obvious opportunities to development at Leatherhead, Dorking and Guildford. It makes one wonder if there is a vested interest at work – particularly bearing in mind the recent history of planners benefitting from their connection with developers.

The green belt was devised to prevent exactly this type of proposal.

The plan remains largely unchanged and thus all the original 30,000 odd objections made previously remain.

I must say this latest proposal is designed to change very little and to hope that people give up objecting because it does no good. It seems you think that if you just change the plan a tiny bit it will go through without problem and if you do it often enough the residents will give up.

I know of many who have given up objecting as it alters nothing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/169  Respondent: 10624193 / T.M. Arnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Local Plan 2016

I write to confirm my total opposition to the local plan you proposed on 6 June 2016. The reasons for my opposition are:-

1. In my view, the removal of any green belt protection amounts to the desecration of our lovely villages & countryside. Many parts of these areas have rare & or protected animal & plant species.

2. The roads around this area are far too narrow and are clearly unsuitable for any additional traffic. My estimation is that an additional 643 houses would mean about a further 1200 cars using our narrow lanes and roads (see also next point)

3. The proposed development of 2000 houses at Wisley Airfield would add about another 4000 cars all trying to reach the A3 or M25 at about the same time each day. In all about an extra 5000 cars would be generated without taking into account the additional commercial vehicles.

4. The narrow country roads cannot support this additional traffic growth nor could it be safe to put so much additional traffic onto the A3 and M25. A large number of vehicles would try to avoid the bottle necks that would be created by using the minor roads as escape routes (rat runs).

5 In any event it was promised that the Wisley Airfield would be returned to green belt after the war and the government promise should be kept.

6. There are already long queues on the A3 north bound & south bound at the M25 junction during rush hours.

7. The decision on local expansion should lie with local people not with people who would be unaffected.

8. There are large areas to the West of Guildford that would be much more suitable for development.
9. The area north of the A3 towards Woking also would be better able to accommodate additional housing and traffic as would Farnham, Aldershot, Farnborough & Fleet.

10. Equally there are many brown field sites around Guildford, Leatherhead, Godalming & Dorking which should be used in place of your proposals.

11. There is no large demand for additional housing in this area.

12. There are not enough doctors in the area.

13. There are not enough schools or teachers in the area.

14. Expanding existing schools is not a solution & would mean education standards would drop dramatically- large schools invariably mean poor standards of education (&indeed behaviour).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

4) Policy A35 Land at former Wesley airfield, Ockham. In the AECOM assessment, this site has, by some margin, the poorest sustainability appraisal. GBC Is proposing to choose to ignore the many hundreds of objections lodged in respect of the planning application for this site. I STRONGLY OBJECT TO SITE POLICY A35, THE CREATION OF A NEW SETTLEMENT AT THE FORMER WISLEY AIRFIELD.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

SITES POLICIES:

Policy A35: Wisley Airfield. I object to this proposal. The proposed Wisley development is probably the craziest thing in this entire document. It represents Town Planning at its very worst. The idea is to build what is effectively a new town in the heart of beautiful and historic Surrey countryside, full of pretty villages which have grown up over a thousand years. The traffic impact will be horrendous. The impact of the protected wildlife next to this site will be catastrophic. All new services will need to be brought in. And who will guarantee that all of this actually? Well.....actually, nobody knows...
because the entire project is being run anonymously. Everything that is wrong with town planning in England is symbolized in this proposal. I OBJECT TO POLICY A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1635  Respondent: 10641953 / Wiesia Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal to build a new town on the site of the former Wisley airfield is an appalling idea and should be removed from the Local Plan without delay. This site has no redeeming merits whatsoever. It has no facilities or infrastructure, will destroy local wildlife, will see new homes build in an area of high air pollution, and it will have a major impact on local schools, doctors’ surgeries, etc. This is a picturesque, historic area. To transplant a piece of central London and parachute it into the midst of these five beautiful rural villages is the worst planning proposal I have ever seen.

This site should have been removed from the revised Local Plan. It is a mystery to me why it was not, when other sites with far fewer deficiencies were removed. I strongly object to Policy A35.

For these three major reasons I object generally to the revised Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5608  Respondent: 10647169 / Richard Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed Wisley airfield development seems to have paid little account to the needs of infrastructure - approx 4000 extra cars all driving on the existing roads/lanes, children accessing secondary schools (do the schools have places?) will result in road chaos.

Air and noise pollution from the nearby A3 and M25 exacerbated by the extra 4000 cars - will it be a healthy environment to live in?

The Wisley development will eventually result in the unintended amalgamation of the villages of Ripley, Cobham, Effingham and Horsley into one large strip development - has that result been considered and planned for?

To sum up, the proposed housing developments are too big, seem to lack forward planning and there is no infrastructure planned to deal with it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Although there are many other aspects of the latest version of the Guildford Plan which have clearly not been thought out properly, I will not add to my list of objections at this stage, except for the outrageous issue which is the long standing Wisley Airfield site and the fact that despite a unanimous decision of the Council to turn down this Application, it has been allowed to remain as part of the Guildford Plan. This disgraceful decision is an assault on the electorate and unless speedily rectified will be indelibly engraved in the hearts and memories of voters. So you may take it that I also strongly object to any development of the Wisley Airfield site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Site A35 Wisley Airfield
I object to the proposed increase to 95.9 hectares. The resultant increase in traffic volumes would be excessive on top of the existing traffic levels especially in Ripley where traffic is often at a standstill at morning and afternoon peak times. Newark Lane, in particular, cannot cater for any additional traffic and yet it would be the most likely favoured route for traffic to Woking from the Airfield development. Once again I object to the gross misuse of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

3 Wisley airfield (support proposal)

3.1 An application was recently refused on the grounds of "inappropriate development" in the Green Belt, giving future objectors a convenient menu of items for their continued opposition. However, it is apparent that the Council is actually in favour of the development and further applications will come forward in due course.

3.2 At this stage, there can be no certainty that it will ultimately be approved. If 2000 houses are suddenly removed from the housing proposals to meet an "objectively assessed need", then the whole plan will be in jeopardy at examination.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3881  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT also to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee recently rejected a recent planning application for precisely this development was unanimously on 14 separate grounds.[1] This deceived many residents into thinking that it has been defeated: scandalously, the site had been included in the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers that they should try again.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given additional months to refine their application. Residents are disturbed by apparent party links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.[2]

Three Farms Meadows before WW2 was a valuable argricultural asset to the UK. It still is. It grows enough wheat for 1 million loaves of bread.

The hamlet of Ockham gladly helped the war effort by allowing the fields to be used for the defence of the realm on the understanding and promise from HM Government that after hostislities ceased it would be returned to farm land and the hamlet to a quiet rural existence. For their loyalty to King and country the villagers have been let down and subjected to the threat of the engulfment of the hamlet and the end of their peace and quiet as well as the loss of a valuable food production resource that the country needs to be self supporting (UK only produces half of what it consumes as food. - 2015).

Ockham is a historic place. The home home of ‘William of Occam’ philosopher and author of Occam’s Razor.

Ockham is the home of ‘Ada Lovelace’ the world’s first computer programmer (now on the UK passport)

The site of ‘The Ockam Hoard’ a Bronze Age Hoard of bronze axe heads and jewellery now at the British Museum.

The hamlet is a Grade 1 listed architectural treasure and must be protected.

Please remove Three farms Meadows from the Local Plan immediately.

Policy A35 should be summarily removed from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”;
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it;
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA);
• Proximity to A3/M25 bottleneck and Ripley village and roundabouts;
• Absence of adequate traffic data;
• Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school;
• Loss of high-quality agricultural land (55% of the site), in breach of national policy;
• Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households;
• Presence of a Surrey County Council safeguarded waste site;
• Cost of infrastructure required to the detriment of alternative more favourable sites;
• Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity;
• Impact on listed buildings;
• Difficulty of SANG siting and inability to divert residents and their pets away from the SPA;
• Extreme housing density with tiny garden spaces;
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure;
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames;
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.


[2] Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).

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? ( )

Objection to Site 35. Proposed development at site A35 Three Farms Meadows, the former Wisley Airfield in The Draft Local Plan.
The people of Ockham helped to win the war. Will they be allowed to live in peace?

When captain ‘Mutt’ Summers (pictured left), chief test pilot for Vickers Armstrong made his emergency landing on a grassy stretch of Ockham farmland during the early stages of World War 2 he could not have guessed at the far reaching changes his discovery would bring to the local residents.
They were accustomed to walking across the green fields from Elm Corner to Ockham Church on a Sunday morning and enjoying lunch with vegetables grown in the the big field at Elm Corner.

However, the land was requisitioned in 1943 by the Ministry of Defence to make way for an airfield. Access to the public was denied, rights of way closed and four farms Stratford, Hyde, Corsair and Cuckoo together with buildings were demolished.
“Wisley Airfield” is so called because most of the land used to be in the parish of Wisley, until the reorganisation of parish boundaries in 1938. Now the airfield is totally within the civil parish of Ockham.

Following requisition in 1943 The Ministry of Defence promised and gave assurances that after the cessation of hostilities it would be returned and restored to agricultural use. It never was. The government never delivered its promise to the people of Ockham who surrendered land so that our country did not have to surrender to Hitler. The ‘Crichel Down Code’ decrees that land commissioned in an emergency must be offered back to the existing owners in the same condition as before. It never was. The people of Ockham who helped to fight off foreign invaders now are having to fight off foreign Cayman Island investors who seek to concrete over their historic Green Belt hamlet. Isn’t it high time, after 75 years, that the good people of Ockham, for their war time sacrifice, were given their just reward – peace.

Ockham History. Historic Ockham Village deserves special protection status because it is nationally important hamlet and should not be subsumed into a ‘new town’ It is…

1. The birthplace of the philosopher William of Ockham. famous for ‘Ockham’s Razor’.
2. The home of Ada Lovelace The worlds’ first computer programmer.
3. The site of ‘The Ockham Hoard’ a significant Bronze Age archeological find now at The British Museum.

I also continue to object to the inclusion of site A35, Three Farms Meadows in the draft Local Plan for many more reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J110)
3. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account.
7. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. Opportunity (3) should be common to all sites and is not unique to this site
12. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
13. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
14. I object to the removal of additional 3.1 ha from the green belt without any justification.

15. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

16. I object to paragraph 22 as this does not reflect the impact of the buildings on the surrounding area.

17. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

18. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

19. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

20. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

21. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

22. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

23. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

24. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

27. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

28. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

29. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

30. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

31. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

32. 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.

33. I object to the loss of prime agricultural land that can produce around 1 million loaves of bread per year when the UK produces less than half the food it consumes.
34. I object to the council ignoring The House of Commons Environmental Audit Committee 2014-15 who warned of the dangers to child health which are recorded in the findings of this committee. Excerpt from the committee findings. "New schools, hospitals and care homes must not be built next to air pollution hotspots to help reduce the tens of thousands of deaths currently being caused by nitrogen dioxide (NO2) and particulate pollution (PM 2.5 & PM 10) every year in our cities, Existing schools next to busy roads should also be fitted with air filtration systems. Wisley/A3 is one of the biggest pollution black-spots in the UK.

For the reasons listed above and numerous other reasons I consider this Local Plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3781  Respondent: 10668897 / Mary Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6664  Respondent: 10670529 / Jennifer McIndoe  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed development of 2,000 homes at the Wisley Airfield site, which in currently in the Green Belt and in direct contravention of Central Government's commitment to the protection of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2655  Respondent: 10678465 / M.J Wright  Agent:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  - The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  - The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  - The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  - The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  - The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  - The lack of suitable public transport stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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 policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

2. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

3. 26 I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

4. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations. There should be a clear statement as to how this has been allowed to happen.

5. I object to the extension of the plan period by 1 year as it has not been identified as a major change

6. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

7. 18 I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. What is being done in this regard?

8. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

9. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
10. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
11. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building. All the arguments with regard to conservation in the area apply.
12. I object that the changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
13. Reliance on Woking Station is unsustainable. Woking is already at capacity in terms of the station itself and nearby parking.
14. Additional bus services would compromise the safety of those cycling and walking in the area.
15. Its location to the M25 at J10 and the A3 means overloading one of the most congested junctions in SE England.
16. I object to the application of new housing on the old Wisley Airfield on the ground that it is the least sustainable strategic site in either version primarily due to its physical location.
17. The site is further from the railway station than any other proposed site. This station has insufficient trains to deal with increased passengers and a very small car park which is already filled to capacity. There is no scope to increase the size of the car park.
18. Local roads are at capacity and increased public transport would have to negotiate over already overcrowded SRN. They would be unable to offer a reliable service.
19. Additional visitors to the RHS Wisley have not been included.
20. There is insufficient employment opportunities on the proposed site. All residents will therefore need to travel to work by public or private means.
21. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
22. I believe that opportunity (3) should be common to all sites and is not unique to this site. I object that insufficient consideration has been given to this.
23. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB. What has been done in this regard?
24. I object to the removal of additional 3.1 ha from the green belt without any justification.
25. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
26. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
27. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
28. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
29. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
30. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. No reasonable explanation has been given for this.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
33. 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.

I therefore consider that this plan is unsound and not fit for purpose and must be rejected.

**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>PSLPS16/831</th>
<th>Respondent:</th>
<th>10717985 / Alison Drennan</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ( )

I object to excessive building on this site and that it is still included in the Local Plan, despite GBC unanimously voting against planning in April 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to GBC retaining the proposed building at Wisley Airfield, despite their unanimously rejecting planning proposal in April. Just more evidence of their knee-jerk and unconsidered and inadequate approach to local planning and development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>10718113 / Peter Homonko</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley Airfield Development.

I have a strong suspicion that someone in the council saw this area on a map and thought “great, build 2,000+ houses there and we’ll easily meet the councils projected housing needs in one fell swoop. No need to do the job properly and look for all the brown field sites that could be developed first … that’s too much like hard work”. Then a developer comes along and says yes, we can build all those houses for you at Wisley, no bother (whilst rubbing his/her hands at the massive profits they’ll make in the process). Nowhere do I see that the council has demonstrated that they have really looked long and hard at the impact of such a massive development, or at the infrastructure needs it would mandate, or more critically, at potentially better and less impactful alternatives.

Further, now that we are in Brexit mode, is it the councils intention to look at how this factor might change future housing needs?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2281  Respondent: 10729857 / Lynne Daniel  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the development of 2000 new houses at Wisley Airfield, as although we have been told this is more feasible due to the development of the new interchange onto the A3 at Burnt Common – access to this is planned via the Portsmouth Road, which would reduce the Portsmouth Road to a crawl at best.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3744  Respondent: 10731329 / Sheila Hookins  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 street lights, 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil
secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial
improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport examples. The local rail stations of Effingham and Horsley cannot cope with the proposed
increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the
borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will
exacerbate this situation, impacting the health of all current and future residents. No account is being taken of
the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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 meetings. 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows)
- where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of
GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the

(P.S) I would like to know how the people in all these new houses will get to work? The roads are already gridlocked.
Where will all the children go to school? The local schools are already full and overcrowded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5494  Respondent: 10731329 / Sheila Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )
I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1300  Respondent: 10732161 / Anne Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 Wisley Airfield site from the Green Belt.

I object to building any homes, let alone the 2000 proposed, on the Wisley Airfield as it will lead to at least 3000 extra cars in the area and in particular so near the A3 which is already near capacity, leading to frequent tailbacks, especially at the Guildford By-pass, without all the extra vehicles from other sites proposed in the Plan.

I object to the Wisley Airfield proposal as it is in an area of natural beauty with Wisley Lake on one side and the RHS nearby, both of which will lose their attraction if they have a new town on their borders.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3871  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 create a huge new town of 2,000 houses at the former Wisley Airfield which is supposed to be agricultural land and is part of the Green Belt. This proposal is completely out of character with the existing rural environment, will have a devastating effect on the A3 trunk road which is already grossly over-stretched. It will make visiting the nearby Royal Horticultural Gardens difficult to access. The traffic problem will exacerbate the already existing tailbacks which occur every day on the Guildford By-Pass, not to mention similar problems in Ripley and Send. Moreover, to include this site in the Plan is totally inconsistent with planning permission having already been turned down by Guildford Borough Council. It is difficult to envisage the purpose of sneaking it back into the new Plan unless it is to financially benefit the Council or the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2292  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the development of 2000 new houses at Wisley Airfield, as although we have been told this is more feasible due to the development of the new interchange onto the A3 at Burnt Common – access to this is planned via the Portsmouth Road, which would reduce the Portsmouth Road to a crawl at best

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1685  Respondent: 10733665 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

11. I object to the development of 2,000 houses at Wisley Airfield as that will greatly increase traffic congestion and access problems between Ripley, the A3 and the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3492  Respondent: 10749409 / B. Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Development of 2000+ houses etc – I object to the proposed plan and set out below some of the reasons.

I wish to object to the above proposal on the following grounds:-

1. Green Belt has a presumption against development unless there are very special I fail to see any such circumstances in this application.
2. The local roads are unsuitable for an extra 3000+ cars from this. Even allowing for a new access point onto the A3 I Ockham Road North roundabout the flow would be to a congested A3 and narrow surrounding roads. Cut though roads such as Wisley Lane and Newark Lane are single width at various points while the High Street cross roads with Newark Lane and Rose Lane in Ripley is a frequent congestion point. Tinkering with these junctions only pushes the problem further up these narrow roads. To access the A3 southbound, traffic would have to travel through Ripley to the Burnt Common roundabout. Send Road, Send (A247) is also likely to be adversely impacted on an already congested road right through to Old Woking at peak times particularly as there are schools along this route. The Cobham slip road off the A3 northbound is already frequently backed to a standstill onto the A3 itself. See also numerous comments from the A3 Survey in www.getsurrey.co.uk
3. If you link this proposed development to the following potential huge unwarranted developments outlined in the draft Local Plan (some noted below) then on road infrastructure alone it is simply ludicrous:-

1. Site Allocation A 15 Guildford Cathedral - 100 homes I 150+ cars
2. Site Allocation A24 Slyfield - 1000 homes I 1500+ cars
4. Site Allocation A26 Blackwell Farm - 1800 homes I 2700+
5. Site Allocation A42 Tannery Lane, Send -45 Homes I 60+ Site
6. Allocation A43 Garlic Arch -400 homes I 600+ cars
7. Site Allocations A38, A39, A40, A41, A45 - 463 homes I 700+ cars
8. Site Allocation A44 Send Hill, Send - 40 Homes / 60+ cars.

4. By continuing to "over react" to what we are led to believe is a greater need for housing in the south east we are destroying the essence of village life that has "evolved" over hundreds of Small developments of say 4 or 5 houses may be acceptable in some rural areas along with updating and modernising existing stock which would not impact the character of the area. Population and business growth should be dispersed in other areas of the country where there is a need and to even up the "divides" rather than concentrating on a self defeating build more I attract more process in the south east.

5. This Green Belt proposal if allowed could lead to other substantial developments in the vicinity (some mentioned in 3 above) which have already been condemned by local residents during the draft plan consultations and thus should be refused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Site A35 Former Wisley Airfield

- The size increase proposed to 95.9 hectares at the site A35 Former Wisley Airfield means that the volume of traffic which will be using Ripley High Street and local roads will cause congestion and pollution. Nitrous oxide levels are already above safe levels and speeding traffic through rural villages is a danger to local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/128  Respondent: 10773377 / Margaret & Morten Frisch  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The area cannot accommodate a new small town at Wisely for the same reasons. All plans to build on the Wisely airfield should be stopped and the land should be returned to agricultural land as was promised when the airfield was built during World War II

The latest Guildford Borough Council Proposed Submission Local Plan should be rejected in its entirety for the reasons stated above. The local plan can be done so much better!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2506  Respondent: 10773377 / Margaret & Morten Frisch  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Land at former Wisley airfield, Ockham should not be used for housing, but kept as part of the Green Belt. The revisions proposed does not provide any justification for continuing to include this site within the revised Local Plan. I object most strongly to Site Policy A35, the creation of a new village at Wisley airfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5654  Respondent: 10775041 / Keith Jones  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Please find attached my comments on the Guildford Borough Council Proposed Local Plan. I know this is a standard draft letter but it does summarise well my views on 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:** PSLPS16/1791  **Respondent:** 10775937 / R.D. Harvey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am writing to object as strongly as I can to the draft Guildford local plan currently out for consultation. It is with some dismay to note that Three Farms Meadows at Ockham, is still included in the new plan for development of up to 2000 plus houses and an industrial estate.

It seems quite extraordinary that having been unanimously objected to by Guildford Borough Council Planners, it is still being considered as appropriate.

The reasons given for the refusal of the Planning Application have not been mitigated to any degree whatsoever and how, in such a short space of time, the Guildford Borough Planners and Politicians can change their minds so completely, is beyond belief.

The reasons for objecting, certainly to that part of the Local Plan as well as many other proposals, are well rehearsed and well understood by the Planners and local Politicians. Green Belt should always be safeguarded as much as possible, which is of course, specifically dealt with in all Government guidelines relating to such things currently in play.

If the local plan proceeds to be issued in its current form, Guildford Borough Council, in particular the Planning Department and the Councillors who support the Draft, will lose all credibility, if any still exists.

I trust my objection will be treated, along with the hundreds of others that I am sure will be received, in such a way as to show the Council that it is time they started to listen to those whom they serve.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/1800  **Respondent:** 10775937 / R.D. Harvey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I am writing to object as strongly as I can to the draft Guildford local plan currently out for consultation. It is with some dismay to note that Three Farms Meadows at Ockham, is still included in the new plan for development of up to 2000 plus houses and an industrial estate.

It seems quite extraordinary that having been unanimously objected to by Guildford Borough Council Planners, it is still being considered as appropriate.

The reasons given for the refusal of the Planning Application have not been mitigated to any degree whatsoever and how, in such a short space of time, the Guildford Borough Planners and Politicians can change their minds so completely, is beyond belief.

The reasons for objecting, certainly to that part of the Local Plan as well as many other proposals, are well rehearsed and well understood by the Planners and local Politicians. Green Belt should always be safeguarded as much as possible, which is of course, specifically dealt with in all Government guidelines relating to such things currently in play.

If the local plan proceeds to be issued in its current form, Guildford Borough Council, in particular the Planning Department and the Councillors who support the Draft, will lose all credibility, if any still exists.

I would also like to add that the volume of traffic surrounding the M25/A3 junction and the A3 southbound to Guildford and northbound to London, is proving to be a nightmare for local villages and residents and access on and off the A3, not to mention the noise, pollution and danger.

There are more and more accidents every day and it is becoming a very dangerous area to drive. The local lanes around Ockham, Ripley, The Horsleys, Effingham, Bookham etc are struggling to cope with the traffic today and they are not wide enough for cyclists and cars now, so goodness knows how it will be if we have even more housing and businesses in this area. The A3 will become a static car park, like the M25 in this area, particularly at Junction 10 which is already congested eastbound and westbound at present.

I trust my objection will be treated, along with the hundreds of others that I am sure will be received, in such a way as to show the Council that it is time they started to listen to those whom they serve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1056  Respondent: 10776033 / Prue Robinson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope. The local school cannot take any more pupils. The local doctors' surgery cannot take any more patients.
I vehemently object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I ask that you please take note of the deep concerns of a huge number of Send residents and indeed many others who are connected to the village, pass through it on a daily basis and use this area for recreational purposes.

Please would you acknowledge receipt of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy A35 – Land at former Wisley airfield, Ockham

I OBJECT. GBC recently rejected a planning application for this site, so it is extraordinary that they should continue to include it in the Local Plan.

I originally wrote this objection in January 2015. Nothing has changed.

Wisley Airfield is in the Green Belt and has lain largely undisturbed for well over thirty years. It is scarcely a brown-field site and there are no “exceptional circumstances” which would outweigh the harm to the Green Belt were development to go ahead. The site is adjacent to the world-famous Wisley RHS Gardens and to the SPA at Chatley Heath. Destroying a special site and “replacing” it with land elsewhere would be detrimental for the environment, nature and wildlife. The land available at Wisley airfield is not sufficient for the number of houses proposed and there is no prospect of acquiring more. The local roads are not able to cope with the increase in traffic which would result from the development. The main road through East Horsley towards Ockham and Wisley Airfield is Ockham Road South (B2039) which already takes a significant volume of heavy goods traffic. The road is not wide enough for two large commercial vehicles to pass without one ending up on the pavement. Additional traffic caused by development will only make matters worse. The road is dangerous for cyclists – because it is narrow and because it is not maintained adequately, given the volume and weight of traffic it has to handle. Sewerage services, water, gas and electricity supplies are already severely stretched and suffer frequent breakdowns. They cannot cope with significant additional housing. The A3 interchange is uni-directional, allowing traffic to go to and from London and the M25. There is no access to or from the Guildford direction, so traffic will have to go through the centre of Ripley village. The junction of the A3 and M25 already fails to meet European standards on air pollution. Additional housing will only make it worse. The junction of Ockham Road North and the A3 at Ripley, close to the proposed site, is regularly flooded and – not for the first time – was closed for several days last year. Another attempt at drainage work is under way at the moment – there is no reason it will be any more successful in the long term than its predecessors. There is no adequate plan for public transport to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the proposed development of Wisley Airfield and Garlick's Arch as sites of immense natural beauty. Their destruction would be criminal.</td>
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<td>I am also very much against the huge proposed development at Wisley Airfield – the impact on our villages would be enormous.</td>
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<td>And finally I object to the proposed development of Wisley Airfield. Before the war this was farmland and we were always promised by government that the land would be returned to agriculture. The impact on the Horsleys of 2000 houses plus retail and commercial development would be enormous and I consider all the above development is for developers to make a lot of money at the expense of local residents.</td>
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1. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

1. I object to the continued Inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8111 April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6549  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2134  Respondent: 10788001 / William Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the development of the former Wisely Airfield. This will have a massive and detrimental effect on the present road system. There will be increased congestion at the Ockham roundabout as there is no provision for traffic heading South to access the A3. Traffic will travel through Ripley, and contributes to the times before the A3 by hours.

Increased traffic will lead to further air pollution. Motorists wishing to travel by train from Horsley and Effingham Junction will be unable to park, places are already full.

Road Closures in the Ockham area will create havoc.

The new roundabout at Newark lane and Ripley High St. is not necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/395  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support in principle although I have serious concerns over access to and from the A3 and additional traffic going to Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7935  Respondent: 10779425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Policy A35 Wisley

We object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”. 2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).

4. Proximity to A3/M25 bottleneck and Ripley village and roundabouts. 5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. I live in the hamlet of Hatchford and the narrow and winding Ockham lane route to Cobham is not suitable for any increased use by the additional cars set out in point 6b.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. The initial proposals for development of the Former Wisley Airfield proposed a bus route from the development to Cobham via Ockham Lane. This appeared ill thought out with no regard to the safety of walkers and cyclists along the route.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
congested enough as it is without a further 2,000 cars on these narrow roads. Local roads around Wisley suffer terribly with drainage and flooding and no scope for improvements, this will be exasperated if more homes are to be built.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to traffic congestion that will result from the development of the Wisely Airfield / Three Farms Meadows into a 2100 dwelling housing estate

I object also to the proposed plans for development of the Wisely airfield at the Ockham A3 junction into a 2100 dwelling housing estate. There is simply not the local infrastructure in place – primarily transportation infrastructure – to support this development. I live right on Ripley High St and can tell you we have grid-lock every morning in both directions. I invite you to visit and see the long queues, in both directions. 2000 new homes many of which will commute South on the A3 to nearby villages will create massive amounts of new traffic, and it will all go through Ripley’s 1 main road - the High Street to get to the A3 southboard sliproad at Send. As experienced local planners you must already be aware of 2 examples of local precedent to mitigate critical traffic levels in Ripley in the recent past:

1) The relevant local section of the A3 is called the "Ripley Bypass". It was built to divert the massive amount of traffic going down Ripley High St (the "Portsmouth Rd.") around Ripley. This is going to happen again if you build 2100 new houses next to Ripley without letting them use the Ripley bypass. Now you may say they can just go via A3 North, and around the M25/J10 roundabout, but in the morning that is even more seriously gridlocked and it is obvious that faced with a queue 40 mins there or just driving through Ripley then commuters will do the latter.

2) Prior to consideration of the Wisely airfield being used for housing, it was given permission (on Sec. of state appeal) to be a large waste composting plant. This was a huge concern to the late Cllr. John Garrett and he demanded several planning conditions put in place, one of which was a ban on the lorries using the plant driving through Ripley. He understood the problem of increasing the already serious levels of traffic through Ripley and the damage it could cause to the village's character not to mention the safety issues. As you probably know we have 2 schools and a lot of elderly residents in Ripley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham

This letter is further to my letter of 19 June concerning the Proposed Submission Local Plan and provides additional comments on Site Policy A35, ‘land at former Wisley Airfield, Ockham’.

I strongly OBJECT to this proposed policy for the reasons detailed in this letter.

1. The proposed development represents a fundamental breach of Metropolitan Green Belt rules;
2. This site does not meet acceptable levels of sustainability:
3. The site will have a severe impact on local traffic & infrastructure: and
4. The development is totally out of keeping with local character, context & distinctiveness.

Taking these points in turn:

The proposed development represents a fundamental breach of Metropolitan Green Belt rules

The site forms part of the Metropolitan Green Belt. Under NPPF regulations, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

*Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.*

This site does not meet acceptable levels of sustainability

The site has poor sustainability:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

- There are presently no schools, medical services or shops within walking distance of this site;

- There is presently no local employment at this site and little after the development is completed;

- There will be a significant destruction of agricultural land arising from this development;
There will be significant environmental damage from this development;

There is no public transport currently serving this location;

The nearest train stations are Horsley and Effingham Junction, both around 3 miles away - too far to walk. Neither of these stations currently have significant parking capacity available.

Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being ‘sustainable’;

New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

The site will have a severe impact on local traffic & infrastructure

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley’s two stations, shops and nearby schools. Many of these roads that will carry this traffic are without pavements for large stretches, whilst the principle through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which suffer from traffic congestion at peak hours.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will daily cycle 3 or 4 miles along busy roads in order to access one of these two stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

The development is totally out of keeping with local character, context & distinctiveness

In the 2016 Proposed Submission Local Plan, GBC’s first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.
With its proposal to build some 2,100 homes, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The current and historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area.

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1760 homes. East Horsley presently has an overall density of 8.1 dph within its settlement area. Therefore, the proposed development of Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own housing plan policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches emerging GBC Policy H1.

APPENDIX

The following table sets out an analysis of new housing developments proposed in the draft Local Plan and provides an estimate of the new of developments which are set within the Metropolitan Green Belt:

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Homes (net increase)</th>
<th>Currently Greenbelt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford Town Centre</td>
<td>1,172</td>
<td></td>
</tr>
<tr>
<td>Guildford urban area (excluding Town Centre, including SARP)</td>
<td>1,570</td>
<td></td>
</tr>
<tr>
<td>Ash and Tongham</td>
<td>91</td>
<td></td>
</tr>
<tr>
<td>Project Description</td>
<td>Area (ha)</td>
<td>Status</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------</td>
<td>-----------</td>
<td>--------</td>
</tr>
<tr>
<td>Inset villages and infill development within identified Green Belt villages</td>
<td>431</td>
<td>Y</td>
</tr>
<tr>
<td>Rural exception housing</td>
<td>90</td>
<td>Y</td>
</tr>
<tr>
<td>Previously developed land in the Green Belt</td>
<td>299</td>
<td>Y</td>
</tr>
<tr>
<td>Ash and Tongham strategic location of growth</td>
<td>1,241</td>
<td></td>
</tr>
<tr>
<td>Urban extensions to Guildford including Gosden Hill Farm, and Blackwell Farm (Policies A25 and A26)</td>
<td>3,940</td>
<td>Y</td>
</tr>
<tr>
<td>Former Wisley airfield (Policy A35)</td>
<td>2,100</td>
<td>Y</td>
</tr>
<tr>
<td>Normandy and Flexford village expansion (Policy A46)</td>
<td>1,100</td>
<td>Y</td>
</tr>
<tr>
<td>Village extensions (including Ash Green southern site)</td>
<td>993</td>
<td></td>
</tr>
<tr>
<td>Ash Green southern site (Site A27)</td>
<td>58</td>
<td></td>
</tr>
<tr>
<td>Village extensions (excluding Ash Green southern site)</td>
<td>935</td>
<td>Y</td>
</tr>
<tr>
<td>Windfall</td>
<td>625</td>
<td></td>
</tr>
<tr>
<td><strong>Totals:</strong></td>
<td><strong>13,652</strong></td>
<td><strong>8,895</strong></td>
</tr>
<tr>
<td><strong>Proportions:</strong></td>
<td><strong>100%</strong></td>
<td><strong>65%</strong></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2054  
Respondent: 10806465 / Moya Miller  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I further object to the proposals for Wisley airfield - the present road system is fighting to cope with the existing traffic in this popular area, the A3 is always very busy. Considerable thought needs to be given to the provision of a suitable road system BEFORE any building starts here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/4468 | Respondent: 10806561 / Deborah Stephens | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A35 I object very strongly to building of any kind on the Wisley Airfield site. This is a location of historical interest, it is a haven for wildlife and building here would cause many problems for the local environment. This location has no immediate local facilities to support the new "community" which will be created. This will mean more overcrowding at the railway stations in East Horsley and Effingham Junction. More traffic and congestion on local roads and especially on the already crowded A3 and M25.

I believe we are custodians of the countryside and we have a duty to maintain them for our future and the welfare of our future generations.

Please do not allow building on our Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/376 | Respondent: 10806945 / Chris Lee | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy A35 (former Wisley Airfield) due to the increase to 95.9 hectares. The volume of traffic and pollution levels around this site would be totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/2439 | Respondent: 10807745 / Belinda Middleton | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A35 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction to relieve the impact of this development on Ripley do get built, traffic on the A247 through West Clandon and Send will increase dramatically and unsustainably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/136  Respondent: 10816705 / Maggie Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Increasing the size of Site A35 – Former Wisely airfield. The sheer volume of traffic using our High Street and local single track lanes will cause further intolerable congestion and pollution. More and more cyclist use these routes and increasing traffic will create accident black spots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4115  Respondent: 10816897 / P G Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

While I welcome the removal of housing sites at the Ramada Hotel and the fields south of East Lane, the remaining proposals are still unacceptable. The construction of a new village on the Wisley site would mean overloading of local roads especially Ockham Road South. If the plan is executed, the local transport system, roads, rail and busses would require a significant increase in capacity, whereas at present local services are being cut back. Furthermore the remodelling of the M25 interchange at Wisley would add to local disruption.

At present local GP surgeries are struggling to cope. The increased population from the plan would only increase the pressure.

Does the plan also allow for an increase in police and fire service personnel required for this population?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2778  Respondent: 10817121 / Roger Adams  Agent:
**Site A35: Land at former Wisley airfield, Ockham**

I OBJECT to this policy for the following reasons:

- **The proposed development site**

  I believe the development site to be set entirely within the Metropolitan Greenbelt as opposed to the statement on the Wisley Airfield website (http://wisleyairfield.com/) which calls it the “the biggest brownfield site in the Guildford area”. Removal of this site from the Green Belt is totally against NPPF rules, regulations and its underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

  I can see no demonstration of any of the exceptional circumstances necessary to alter greenbelt boundaries. Thus the proposal is inappropriate development in the Green Belt as defined by NPPF paras 88 and 89.

  I also believe that:

  - The vast majority of the site (70.1 ha) is Grade 3 quality agricultural land. This arable land has been farmed for many years and, I understand, produces over a million loaves of bread a year.
  - Currently the site is crossed by a number of Public Rights of Way, both footpaths and bridleways, which are used by local residents.

  NPPF para 79 states:

  “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

  I believe the above bullet points show the proposed development is to be at odds with this.

  Therefore I OBJECT to Policy A35 as a breach of the Metropolitan Green Belt rules.

- **Levels of sustainability**

  One of the core concepts of planning policy is sustainability. However this site is rated very poorly in terms of its sustainability according to a sustainability appraisal undertaken by GBC’s consultant, AECOM. This is presented in the Local Plan Evidence Base report ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ issued in June 2016.

  I understand that in their report AECOM rated Site A35 as the very worst of all of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), in terms of its sustainability. No less than 8 out of the 21 criteria were graded as ‘Red’ by AECOM for this site, more than any other large site.

  Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

- **Impact on local traffic and infrastructure**

  The proposed development will have a severe adverse impact on road traffic in the surrounding area including my own village of East Horsley. This will be as a result of the high volume of additional traffic which is likely from the residents of Wisley Airfield accessing East Horsley’s two stations, shops, nearby schools and medical facilities.
I estimate that with 2000 dwellings the additional volume of traffic will be in the order of 3,000 cars. This is a considerable increase but there is no detail I could find on the Wisley Airfield website re improving local roads save for the rather bland statement:

“We’re also making improvements to local roads to reduce rat running, improve traffic flow and increase safety. The proposals also see improvements to local footpaths and bridleways.”

The rural roads in this area are characteristically narrow winding ‘lanes’ – a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s through roads. Many of these ‘lanes’ are without pavements for large stretches. Further the main through-roads of Ockham Road North, Ockham Road South and Forest Road pass along poorly lit residential areas so narrow that large vehicles such as buses cannot pass each other in certain sections of these ‘lanes’. Indeed each of these roads has pinch points where one can only just fit two cars abreast, let alone two large vehicles.

There are many schoolchildren who both cycle and walk along these through roads on their way to local schools. Ockham Road North has only a narrow footpath through East Horsley village and Forest Road has no footpath in places. The additional traffic will therefore increase the likelihood of accidents and reduce the safety of their journeys.

The road closures and junction changes which I have seen mentioned previously accompanying this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak times. Also any resultant increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority. I understand Highways England have repeatedly expressed serious concerns about this development.

The Wisley Airfield website states that there are 9 mainline stations within 5 miles. The reality, I suggest, will be that the vast majority of inhabitants of this development would in fact travel from Effingham Junction or Horsley stations. Why? Because they are the nearest stations, much quicker to reach than the others, especially at peak times, and it is cheaper and quicker, in terms of overall journey time, to travel from these to London or Guildford (which is where most people would be going) than from elsewhere.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity, something I know from personal experience! The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel to and from these stations lacks credibility.

Also proposals include plans for buses to run through the site to major local destinations approximately every 10 minutes at peak times. I wonder what these peak times would be. Many commuters to London start early and/or finish late. There is no local taxi service at Effingham Junction station so once again no doubt a car would be used– further increasing traffic volumes.

Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure

- **Health and Safety Concerns**

  The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country with traffic frequently at a standstill during peak hours. This must affect the air quality in the locality. I have seen figures from the Wisley Action Group website in the past showing the Nitrous Oxide (‘NOx’) levels being above the EU limit of 40 mg/m³. This will doubtless affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

  In addition, I believe residents of the proposed development will rely on cars as their main mode of transport. I estimate this means around an extra 3,000 cars This will increase the problem of poor air quality.
NPPF para 109 says:

“The planning system should contribute to and enhance the natural and local environment by” ....

“... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability”.

I believe that the points I have made above demonstrate that the proposed development runs contrary to the above NPPF paragraph.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications

- **Local Character**

The development is inappropriate in size and type with regard to the surrounding villages. In the 2016 proposed Local Plan, GBC’s very first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.

The area is essentially rural with many charming picturesque rural villages, such as Ockham, East and West Horsley and Ripley, containing historic, listed or protected buildings. However the proposed development is large in comparison to the local villages. It would create a community of just over 2000 homes. This is much larger than the nearest village, Ockham, which has less than 200 dwellings, and would represent an increase of around ten times the existing housing stock. It would effectively be not far short of the combined housing stock of East and West Horsley.

With respect to Ockham, would this mean the disappearance of a small historic rural village?

Ockham is documented as being in existence as far back as the 11th Century when it was mentioned in the Domesday Book of 1086 as Bocheham. It has a number of historic buildings including All Saints, a Grade 1 listed building which has a nave which is partly 12th century, as are its foundations and other parts dating from the 13th and 15th centuries. Others include Ockham Park, a 17th century country house at one time home of Ada Lovelace the famous mathematician whose work on early computers with Charles Babbage is renowned world-wide, Ockham Mill dating from the Victorian Era and The Hautbouy built in typical brick and flint Lovelace style. In addition it is the birthplace of William of Ockham, the famous medieval philosopher and inventor of the theory of Occam’s Razor.

The proposed development seems to effectively ‘absorb’ the medieval hamlet of Ockham. I believe that this would cause Ockham to lose its identity and doubtless, in the fullness of time, be forgotten. What a tragedy that a village so rich in our history should be treated thus. This should not be allowed to happen.

The overall housing density of the Wisley Airfield settlement area I have seen calculated at around 49 dwellings per hectare (‘dph’). I understand that this density is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense. Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley.

I believe the character of this whole area would be irreparably destroyed if this proposed development were to go ahead. The development therefore fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

Thus, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

- **Historic environment**

This is covered in some detail in Policy D3 of the GBC proposed plan. In particular it says:
"Heritage assets are an irreplaceable resource and 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."

The Horsleys, Ockham and Ripley all contain a wide range of heritage assets which make an important contribution to the look and feel of the villages, their character and the environment surrounding them. I have given an example for Ockham village under Local Character above. However it is true also of the other villages I mention.

Thus, I OBJECT to Policy A35 on the grounds that it fails to meet the criteria set out in Policy D3, Historic Environment.

- **Environmental Objections**

The site is immediately adjacent to the Site of Special Scientific Interest (SSSI) at Ockham and Wisley Commons. Much of the development site is within 400m of the Thames Basin Heath Special Protection Area (SPA). Land within 400m of the SPA is designated as an ‘Exclusion Zone’ where “there will be a presumption against additional new dwellings”.

The remainder of the site falls within the 400m - 5km ‘Zone of Influence’ set out under the SPA policy, which requires developers to contribute a new Site of Alternative Natural Greenspace (‘SANG’) to mitigate for potential damage caused to the SPA from new development. I cannot understand how any proposal for a SANG can possibly mitigate the potential damage caused to the natural habitats of the bats, ground nesting birds, invertebrates, reptiles and flora and fauna by these additional residents and their pets. Furthermore I am concerned about the impact of the development’s residents, whom I estimate them to number in excess of 5,000, on the Thames Basin Heaths SPA, even with the 400m exclusion zone in place.

It is, I believe, generally acknowledged that “concreting over the countryside” increases the likelihood of flooding as rainwater can no longer drain away naturally into the earth. Indeed there was an article in The Mail Online dated 26th March 2015 stating that 19 scientists, from prestigious universities and institutes in Britain, the US, Japan, Australia and across Europe, claim over-development is making flooding much worse.

Given the size of the planned development this alone should give cause for concern. However there is a further point which adds to this concern. The development is very close to, and slopes down towards, Ockham Road North (ORN) where it is prone to flooding, close to where it meets the A3 roundabout. Local residents I am sure still remember the floods during the winter of 2013/2014 when ORN was impassable for a lengthy period.

In addition, development of this scale would, in my opinion, increase light and noise pollution in its vicinity. This would affect both current local residents and existing wildlife.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse environmental impact.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/515  **Respondent:** 10818529 / John Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )
As someone who was born in Guildford, gone to school in Guildford and lived in Clandon for a large part of my life, I remain hugely uncomfortable with the proposed development plan for Wisley Airfield and Garlick’s Arch. This is not small local in-fill development for the benefit of local business it is unwarranted development of a substantial rural area which if allowed will infringe on other areas merging villages and roads in a manner more consistent with London than Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4488  **Respondent:** 10819489 / Susan Cooper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the development of Wisley Airfield

There is no doubt we have to provide some new homes and they have to go somewhere. Wisley airfield is in my view suitable, but only if the site is provided with direct access to junction 10 of the M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/437  **Respondent:** 10819617 / Kate Gill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. How can land be identified as Green Belt ie: protected and then ‘unprotected’ like this – it is a mockery of the whole concept of protection!
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is simply too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Commuters going to Effingham station are NOT going to cycle or walk!
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. These are small lanes which don’t have the capacity to take this sort of traffic.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The increase in traffic will create a danger to those who do cycle (and pedestrians walking to the woods with their dogs), due to the absence of any cycling paths and the lack of pedestrian footpaths (as there is no space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Where are all these extra commuters going to park? This will lead to further development of common land which is again ‘protected’.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, which is already in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. My husband and son are both asthmatic.

9) I object to the fact 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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I simply fail to see how the local planning committee can be even reconsidering this application with so many people objecting. It certainly appears to me that the opinions of the locals are not being listened to at all. Rumours abound concerning the investment company whose registered office is in the Cayman Islands and one has to wonder given recent exposes concerning companies from that region whether everything is actually as it should be….

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6204  Respondent: 10820417 / Trevor Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to A35 Wisley Airfield as 200 homes that are totally inappropriate and unsustainable development 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: PSLPS16/6212  Respondent: 10820481 / Lisa Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to A35 Wisley Airfield as 200 homes that are totally inappropriate and unsustainable development 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: PSLPS16/7358  Respondent: 10828737 / Claire Dawson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to A35 Wisley Airfield as 200 homes that are totally inappropriate and unsustainable development in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
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**Ockham and Wisley Airfield new town**

Local transport potential is poor (local bus services have been or are about to be cut). It is about as far from a railway station as it is possible to get in this part of the borough. Local roads are narrow winding country lanes with no spare capacity.

Emissions are a serious health hazard to people in any dwellings within 500m of a motorway. The closeness of the A3 and the M25 make the health risks a problem.

Dangerous to have more traffic arriving on an already hazardous area (A3 junction).

The charming villages of Ockham, Wisley and surrounds would be completely swamped and ruined. Unacceptable amounts of traffic sent into Ripley village!

The merging of villages!

If the Airfield site were to accommodate the proposed number of ‘affordable’ homes, the impact would effectively destroy the village altogether. The character of the area would alter irrevocably and for the worse.

In my opinion this site should be returned to needed agricultural land as previous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5933  **Respondent:** 10828801 / Kathryn Fox  **Agent:**

<table>
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I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send. The A3 is already at capacity in this area and causes major delays accessing the M25

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/564  **Respondent:** 10829889 / Geraldine Leiper  **Agent:**

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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 detrimental impact on transport, local roads and road safety. A proposed development of 2068 homes would result in an estimated 4000 cars on already congested roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/565  **Respondent:** 10829889 / Geraldine Leiper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to removal of Former Wisley Airfield from the green belt. Under the NPPF no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the continued inclusion of a site (Former Wisley Airfield now known as Three Farm Meadows) – where the planning application has already been unanimously rejected by GBC’s Planning Committee. Serious concerns about this site have been raised by Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farm Meadows), Allocation A35, is removed from the local plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/3216  **Respondent:** 10829889 / Geraldine Leiper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I write to strongly object to the revised local plan.

In particular ref A35, 3 Farms Meadows.

The local roads are at maximum capacity & the A3 is regularly gridlocked around junction 10 of the M25.

This development would be adjacent to RHS Wisley which is such a popular visitor attraction & is planning to increase its visitors which often causes problems on the surrounding roads already.

The Heathrow Beacon will remain according to NATS so this will drastically reduce these plans re height restrictions & distance required from the Beacon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Allocation A 35 - Proposed Development of former Wisley Airfield

I wish to voice my strong objections to the above development of a new settlement of up to 2100 new dwellings.

I object to the building of this huge development to the detriment of the local rural villages of Ockham, Ripley, East and West Horsley where facilities are already stretched to breaking point and have their own development plans.

I object to this site being on Green Belt land and that this plan has already been rejected by Guildford Borough Council.

I object to the plan because increased traffic on narrow congested rural roads will endanger lives. There is no space for cycle lanes and the access planned for the site is dangerous exiting from the A3. The parking facilities at both Horsley and Effingham railway stations are full to capacity.

I object to this plan because it will ruin the lives of many people who live in these attractive rural villages in Surrey.

Please remove this development from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the development of over 2,000 houses in Ockham on the former Wisley Airfield. The impact of such a huge mixed housing and commercial development only two miles away will be enormous. No adequate thought has gone into planning any appropriate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY A35: Land at former Wisley Airfield Policy

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

Summary Surrey is a beautiful county enjoyed by the people from London and further afield, the beauty comes from the structure of open land, green fields and villages, which has been preserved through planning constraints and the Green Belt. The GBC Local Plan sets out to erode the green spaces of Surrey, put strain onto the infrastructure already under strain, and allow housing developments on a scale that is not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7993  Respondent: 10832321 / Robert Deatker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I OBJECT to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3818  Respondent: 10832321 / Robert Deatker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
There are some small changes made in the revised Local Plan to Site Policy A35, Land at Wisley airfield in Ockham. However, these changes do not provide any justification for continuing to include this site within the revised Local Plan. Having made a downward revision to its housing targets in the revised 2017 Local Plan draft, GBC is proposing to remove a number of development sites that were included in the 2016 version of the plan. The largest site removed is addressed by Site Policy No. 46 located in Normandy (‘Land to the south of Normandy and north of Flexford’) where a mixed use development of 1,100 homes had previously been proposed.

Whilst I have no objection to the removal of this policy site per se, I would question GBC’s decision-making process of site selection which chooses to remove this site from the local plan rather than the Wisley airfield site. Of all the larger sites included in the 2017 draft Local Plan, Wisley airfield has by far the worst sustainability. In the updated 2017 Sustainability Assessment provided by GBC’s consultant AECOM, Wisley airfield is by some margin the site with the poorest sustainability appraisal – it has no less than 8 red flags in the AECOM criteria list. By comparison Site No. 46 in Normandy is much more sustainable yet it is the one selected to be removed from the plan.

In rejecting a 2015 planning application for development at the Wisley site (proposed in advance of the Local Plan) GBC identified no less than 14 reasons to justify their rejection of the planning application, only one of which was the issue of it being in the Green Belt. The reminder highlighted a long list of deficiencies associated with this proposed development including its major impact on traffic flows, its severe environmental impacts, its total lack of existing transport and other infrastructure, as well as many other factors. According to GBC’s consultation website, a total of 1,429 comments were registered in the 2016 Local Plan consultation about the Wisley airfield site – 97% of them were against its development. And yet GBC chooses to maintain Wisley airfield as a policy site in the 2017 revised Local Plan.

With a planning appeal due to be heard in September 2017, I trust that if the planning inspector decides to reject the appeal of Wisley Property Investments, then GBC will finally listen to the views of so many of its residents, accept the AECOM sustainability conclusions on the deficiencies of this site and remove Wisley airfield entirely from the Local Plan.

I therefore continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for a number of reasons including:

1. This is the least sustainable site identified in both the current and previous versions of the Local Plan because of the site constraints and location.
2. This site is further from railway stations than any other identified strategic site.
3. The site is adjacent to the most congested stretch of strategic road network (SRN) in the county and close to one the most congested junction in the country (M25 -J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (in peak times and also due to accidents, diversions, roadworks etc)
5. Suggested public transport initiatives including bus services to and from Guildford will exacerbate the already over crowded road network leading to unreliability and delay, which in turn will make local residents choose individual modes of transport resulting in further congestion.
6. Public transport bus services to Horsley will reduce the safety of the local road network as lanes are narrow and this will increase danger to cyclists and walkers which should be encouraged as eco friendly alternatives. The area is greatly used by cyclists at all times throughout the year who seek to follow the 2012 Olympic cycle route and train for the annual Ride London –Surrey 100 cycle event. The current plan will add to traffic flows and endanger cyclists and walkers lives.
7. The proposed site is adjacent to the Royal Horticultural Society gardens, which is one of the most visited destinations in the south-east of the country. I understand that expansion plans the RHS have will significantly increase the number of visitors to Wisley. From reading the plan, the resultant traffic increase from the RHS has not been considered. Furthermore, there are regular events at the RHS which attract 1,000’s of additional visitors and again the impact of this increase in traffic does not appear to have been taken into consideration.
8. Once completed, there will be minimal employment opportunities on the developed site as a result of which, the majority of new residents will travel to work. The majority of these are likely to use motor cars ( probably with only a driver) and this will add significant volumes of traffic to the already over crowded local narrow lanes.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

12. Opportunity (3) should be common to all sites and is not unique to this site

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

16. I object to the removal of additional 3.1 ha from the green belt without any justification

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a Regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

As a further over arching comment on local and government policy, I do not understand why more emphasis is not being given to long term investment in developing other parts of the UK. It is evident that the South East and the London conurbation in particular is over crowded. The answer is not to destroy the green belt but to encourage a shift in population to other areas which have been neglected by successive governments.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/5820</th>
<th>Respondent: 10835617 / Glenis Pycraft</th>
<th>Agent:</th>
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I object to the large proposed development at 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm. Not only will this result in large areas of Green Belt being destroyed, but it will also add to the heavy traffic congestion on the A3, especially at the junction with the M25 and through Ripley, Send and Send Marsh, which are already under immense pressure from the volume of traffic travelling through and around these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy A35 - Land at Wisley Airfield. (Three Farm Meadows). The continued retention of this land in the Local Plan for the planned building of massive housing estates total over 2000 houses is completely unacceptable. Not only will the small village feel of the areas be completely lost but the areas simply cannot take that volume of new housing all at once. There is not the infrastructure nor the amenities in the areas to be able to handle this volume increase. As a Daily commuter who uses the A3 on a daily basis the roads are already not able to cope with the existing traffic any further increase in volume would be completely unacceptable. The changes in the revised plan are only small and make no effort to address the real issues at stake here regarding the impact on the local communities and infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill in Burpham and 1,850 houses at Blackwell Farm. There is already immense traffic in these areas, particularly around the M25, and as such will only add to the high volume of traffic passing through Send and Send Marsh, which do not have the infrastructure to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5906  Respondent: 10840129 / Roy Smith  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5. The development at Ockham of Wisley Airfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2508  Respondent: 10840161 / Janet Attfield  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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 the A35 and Three Farms Meadows site. This new plan increase the congestion of the local roads, which in many cases are country lanes. The urban sprawl suggested will increase pollution, increase congestion and change the character of the villages now under threat.

The proposed development at Wisley is totally out of the local character of surrounding villages. It is potentially extremely dangerous, as it's exit will be on to a very dangerous junction on the A3 just on the slip road from the M25. I am frightened to envisage children playing close to this fast dual carriage way. Also there will be insufficient work for those residents and so they will have to travel to either Horsley or Woking station. The roads to either of these stations are very narrow. They are also part of the Surrey cycle way. Those roads will become extremely dangerous to any cyclists or walkers. They are not big enough for regular bus routes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6608  Respondent: 10843233 / David Hardiman  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The impact on the Horsley villages of such a huge mix of new development under 2 miles away would be significant. In particular added congestion on the A3 and M25 trunk roads and congestion on local village roads and lanes. Not to mention concerns over poor air quality from the significantly increased traffic and other pollution catalysts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/126  Respondent: 10843489 / Philip Fleming  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The proposed development of 2000 homes on the Wisley Airfield site will have a dramatic negative impact on the Horsleys and I do not agree that the development should 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: PSLPS16/1562  Respondent: 10843905 / G King  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site Allocation Policy A35 Former Wisley Airfield – Strongly Object

I object to this development being on green belt. The scale, bulk and density of the plan on a narrow airstrip is completely inappropriate for the area. The conservation area of Ockham Village, which only has 150 houses, would be completely swamped by this development. The proposed development would have a detrimental impact on the openness of the Green Belt surrounding it. The effect on the habitat in the Thames Basin Heath would be devastating. Damage will occur to the habitats of the protected and endangered rare species. The ground nesting birds would be disturbed by the building works and then the volume of people living in close proximately not to mention the pets that would be introduced to the area.

The surrounding villages, Ripley, Effingham, East and West Horsley, do not have the infrastructure to support such a development. The local schools are over-subscribed and it is already difficult to get a doctor’s appointment at the Medical Centre in East Horsley. The extra volume of traffic would cause even more congestion. The lanes are narrow in places and not very well maintained. The proposed development is on an elevated site and there are already water table problems with localised flooding in the area. Some roads become impassable, Ockham Lane, Ripley Lane, East Lane, Ockham Road North and parts of The Drift. There is no spare parking capacity at Effingham Junction or Horsley stations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/6863</th>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I also wish to object to A35, Wisley airfield. The building of a new town in this location is utterly inappropriate and would cause chaos in the local villages, aside from bringing the already busy A3 and M25 junction to a complete standstill.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</table>
I also wish to object to A35, Wisley airfield. The building of a new town in this location is utterly inappropriate and would cause chaos in the local villages, put further strain in local amenities and increase the already congested A3 and M25 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4870  Respondent: 10844609 / Sam Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Draft Local Plan G B C - OBJECTIONS

I write to object most strongly to the inclusion of the Wisley Airfield in the local plan. We must protect our green belt and exclude this site from the draft local plan without delay. I have written previously to object, our country lanes cannot hold the considerable amount of traffic that would need to be accommodated, the A3 junctions would be even more clogged up than usual at rush hour, air pollution would suffer, the site is unsuitable for a housing development and would spoil the green belt and the protected area and its environs. The potential schools are not needed here. We are served by excellent schools already. This is the wrong area to consider. There are many other sites that could and indeed should be considered. Please start afresh. Take a step back and consider how detrimental this would be to our landscape. Why build on this agricultural land which should be retained as such, as was the original historical intention. There are sites off the M25 that could be considered, and outside Guildford, where much of the housing could be contained.

Please consider carefully all the objections you will receive from residents of this picturesque hamlet of Ockham - don't spoil our countryside in this way. Expand elsewhere but not her at Wisley - green open space enjoyed by so many is becoming a rarity. Conserve and preserve our green belt as was intended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3807  Respondent: 10844897 / H S Lofthouse  Agent:
The application was rejected by GBC on hood ground last year when TFM should have been removed from the Local Plan. It is wrong to bring it back for consideration when it was turned down on so many grounds and for very good reasons.

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification.
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting taxpayers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. 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.

Please consider all of the above and ensure that plans for a large town in the most inappropriate location are again refused. There are many other parcels of land around that can be considered for housing which would not impact on a small community in this way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7663  Respondent: 10844993 / Simon Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield (the subject of which I have written to you twice before), 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land, massively increase congestion on the A3 and the surrounding villages such as Ripley and Send, and create a lot of additional pollution due to traffic. Use brownfield sites which are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2827  Respondent: 10845377 / Natasha Lock  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.
10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6770  Respondent: 10846625 / Frank Drennan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

I object to Policy A35 “Wisley” on the grounds that;

This constitutes a re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on 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:** pslp172/4034  **Respondent:** 10847521 / Andrew Procter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**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 changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

1.2 **My previous objections therefore still stand for** this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

1.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected.
Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

1.5 Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A35 Land at former Wisley Airfield  Guildford Borough Council has already refused this development of over 2000 houses, so why is it in the Local Plan? The local roads will be unable to cope with an additional 4000 cars and there is no access directly on to the southbound A3 without going through Ripley village.

We believe that Surrey County Council has earmarked this site for a recycling facility and feel that a better use would be to have an Electricity Generating Plant burning waste materials which would be a benefit to the local area (the traffic movements would not be as great as the proposed small town). The runways could be used to site Solar Panels to produce electricity as well, these could be screened by planting trees (environmentally friendly) on the Ockham side. The farmer who cultivates the land could be encouraged to produce a crop which could be used for the production of Bio Diesel. This would make Guildford look like a "forward thinking" Council taking care of of the environment and doing its bit for climate change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/154  Respondent: 10848513 / Martin Cole  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Increasing the size of Site A35 – Former Wisely airfield. The sheer volume of traffic using our High Street and local single track lanes will cause further intolerable congestion and pollution. More and more cyclist use these routes and increasing traffic will create accident black spots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5947  Respondent: 10848801 / Dominic Wilson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/355  
Respondent: 10851201 / Jon Woollard  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This e-mail sets out my objections to GBC’s New Local Plan.

I believe GBC is failing in its responsibility to the people of East and West Horsley and surrounding areas, and I itemise below my reasonings.

Wisley

Whilst I recognise that Wisley airfield is redundant land, the area is prone to flooding, as anyone who has lived here long enough knows. The access to the A3/Wisley roundabout tends to flood during serious rainfall, and the road has been impassable several times during the last sixteen years we have lived here. You cannot responsibly build 2000 plus houses and not provide a school, medical centre, some local shops, post office, community centre and recreational space. This should be a new community where people have their own facilities and not have to travel along narrow lanes to source them. These facilities should be put in place at the same time as the houses are built. I have seen no confirmation anywhere that GBC plan to provide these facilities. On average, each house could be expected to own two cars. At present the station car park in East Horsley is full each day. Where are these people going to park if travelling into London. Similarly, it is often difficult to get an appointment at the Doctors surgery, so they wouldn’t be able to cope with so many extra patients. I understand that commuters are now using the Village Hall car park and therefore when the Medical Centre car park is full, we are also unable to park in the Village Hall car park, and this is before just one extra home is built in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2555  
Respondent: 10851201 / Jon Woollard  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley

Whilst I recognise that Wisley airfield is redundant land, the area is prone to flooding, as anyone who has lived here long enough knows. The access to the A3/Wisley roundabout tends to flood during serious rainfall, and the road has been impassable several times during the last sixteen years we have lived here. You cannot responsibly build 2000 plus houses and not provide a school, medical centre, some local shops, post office, community centre and recreational space. This should be a new community where people have their own facilities and not have to travel along narrow lanes to
source them. These facilities should be put in place at the same time as the houses are built. I have seen no confirmation anywhere that GBC plan to provide these facilities. On average, each house could be expected to own two cars. At present the station car park in East Horsley is full each day. Where are these people going to park if travelling into London. Similarly, it is often difficult to get an appointment at the Doctors surgery, so they wouldn’t be able to cope with so many extra patients. I understand that commuters are now using the Village Hall car park and therefore when the Medical Centre car park is full, we are also unable to park in the Village Hall car park, and this is before just one extra home is built in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7751  Respondent: 10851201 / Jon Woollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Development of Wisley Airfield: Ockham’s classification of other rural community includes “Rural communities unsuitable for taking any development including infill housing”. It seems ironic that GBC have now decided to propose a new strategic settlement of some 2,000 new homes on Green Belt land about 200 yards from the properties situated along Ockham Lane and only 2 miles from East Horsley. In the absence of real needs, this is an utter disgrace especially given the concerns with the very limited local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2698  Respondent: 10852065 / S Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport at the local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPII) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3300  Respondent: 10857761 / Daniel & Katy Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Why would you consider creating housing developments for an additional 2000 houses on the A3? Are you attempting to turn Guildford into Croydon by destroying all the surrounding greenbelt land?

Given the recent vote to leave the EU, shouldn't all local governments be reviewing local plans in light of this radical u-turn in policy that will (supposedly) greatly restrict free movement across our borders thus reducing the growth projections of our population in years to come?

We need a sensible plan, that supports realistic growth requirements with new housing and infrastructure projects that will create new jobs and transport facilities accordingly. We need to find a balance and respect the countryside around Guildford!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6226  Respondent: 10858401 / Philip Kite  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Wisley airfield site development site is unsustainable but assume that the RHS favours the potential increase in membership.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3945  Respondent: 10858945 / C P Faithful  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Development of Wisley Airfield into a 2000 house village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8262  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy A35 Wisley

I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected.

Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
• Extreme housing density with tiny garden spaces.
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
• Failure to evaluate the cumulative impact of this and nearby development sites on 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: PSLPS16/2304   Respondent: 10859233 / Alex Davies   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt l Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plan

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I object to the

draft Local Plan for the following key reasons:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

3. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local road No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

6. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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 Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6400  Respondent: 10859393 / Teresa Neasmith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the development of over 2,000 houses at Ockham. This will have a huge and devastating impact on Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3829  Respondent: 10859489 / Jennifer Procter  Agent:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### POLICY A35 WISLEY

1.1 - **I object** to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

1.2 - **My previous objections therefore still stand for** this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

1.3- There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.4- This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

1.5 -Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.
2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
10. Cost of infrastructure required to the detriment of alternative more favourable sites.
11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Wisley Airfield:

This large housing development will clearly overwhelm parking at Horsley and Effingham Rail Stations and Village Car Park, swamp narrow local roads and lanes, cause blockages, rat runs and potential accidents.

I am concerned that it will cut off current footbridge access over the A3 to Wisley RHS.

Effingham Junction needs to expand Parking and have Wisley residents directed to join there instead of Horsley, by Bus or otherwise.

I think the Train Service is not sufficiently frequent with enough Coaches to accommodate the large influx proposed. Overcrowding would arise long before other Surrey Stations board towards London. The service into Guildford is less busy than into London (except on evening commuter return from London at Waterloo).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3) Wisley Airfield:

> This large housing development will clearly overwhelm parking at Horsley and Effingham Rail Stations and Village Car Park, swamp narrow local roads and lanes, cause blockages, rat runs and potential accidents.

> I am concerned that it will cut off current footbridge access over the A3 to Wisley RHS.

> Effingham Junction needs to expand Parking and have Wisley residents directed to join there instead of Horsley, by Bus or otherwise.

> I think the Train Service is not sufficiently frequent with enough Coaches to accommodate the large influx proposed. Overcrowding would arise long before other Surrey Stations board towards London. The service into Guildford is less busy than into London (except on evening commuter return from London at Waterloo).
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:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/3228</th>
<th>Respondent:</th>
<th>10860993 / Peter and Fiona Armitage</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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I also object strongly to the proposals to build 2000 houses on the former Wisley Airfield as this is part of an existing designated green belt area.

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:</th>
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<th>Respondent:</th>
<th>10860993 / Peter and Fiona Armitage</th>
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</table>

I object to the development of Wisley Airfield. The application to build on this site is totally excessive. Again there is no infrastructure to support this development. The village of Ockham would be destroyed.

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:</th>
<th>PSLPS16/1470</th>
<th>Respondent:</th>
<th>10864001 / Chris Virley</th>
<th>Agent:</th>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I am writing as I wish to object to the part of the draught Local Plan referred to below:
• I object to the removal of the former Wisley Airfield land from the Green Belt in order to facilitate a large new development of dwellings and object to the proposed building of 2,000 plus dwellings on the former Wisley Airfield land proposed in the Local This plan is a threat to the rural nature of the village of Ockham and will totally blight the village and the local area if it is acted upon. The increased housing density will be out of all proportion to the village nature and numbers of existing dwellings in Ockham and will impose a huge impact on local roads.

• I object to the plan for Wisley Airfield as it will have a huge and unacceptable impact on the other local villages of Ripley, Send and the Horsleys, all of which also have new housing developments in substantial numbers included in the The proposed building in the local plan of the development on Wisley Airfield will change and spoil the whole character of the area for ever.

• The proposals for the housing development at Wisley Airfield, plus other proposed housing developments in Ripley, Send and the Horsleys are likely to result in 4,000 - 5,000 additional cars moving in and out of these areas on a daily This increase in the volume of traffic is totally unsuitable for the local narrow rural roads in these areas and can only lead to continuous traffic congestion and other traffic problems. Local amenities will be overwhelmed by this influx of people and transport.

• I also object to the local plan's proposed housing developments in The Horsleys, Send and Ripley which are all on rural sites and building over fields and woodland which will be lost for New dwellings which may be needed should be built on the many brownfield sites available in the Guildford area.

I hope these objections will be fully considered and in particular the former Wisley Airfield is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of the old Wisley Airfield site in the draft local plan. This site has proved to be unsuitable for development on so many fronts that Councillors unanimously refused planning consent recently. I fail to understand why it is still included in this new draft 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 the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the proposed development at Wisley (A35) as it would cause significant traffic flow problems through Send and Ripley and cause further congestion on an already congested A3/M25
• I object to the proposed development at Wisley (A35) as many of the proposals have been rejected by the various authorities including sewage works at Ripley could not cope with the increase, SCC has said in the past that it is not a site where they want a new school, GBC has turned many planning proposals down. We do not know and, seemingly cannot find out who the developers are other than from the Caymen Islands. With central governments crack down on offshore companies buying land etc because of money laundering, if this is then made retrospective and it is found that this is the case with this company from the Caymen Islands, what sort of mess would that leave GBC in? It would seem crazy to go ahead with this development unless the company is prepared to disclose what the investors etc are. There is a need for transparency about this company

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3835  Respondent: 10868897 / Paul Brown  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. The geography of London is unique specifically because of the existence of the Green Belt; if not for the Green Belt London would sprawl uncontrollably like so many other cities in the world.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. I use Horsley station every day to commute to London and this small station will not cope with passengers from the proposed additional 2,000+ homes in the area.

7. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000
additional cars on the roads
c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by
wide vehicles including increased bus and HGV movements
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of
pedestrian footpaths (and the space to provide them)
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning
application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on
the site would add additional congestion at the
M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to
the A3 and M25.
Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed
increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site,
in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site
of Nature Conservation Interest (SNCI).
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough,
and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this
situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the
Thames Basin Heaths SPA
and the irreversible impact of the habitat degradation.
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.
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) -
where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL)
planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC
Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also
been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water,
NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
5. Increased traffic in the area will make small country lanes even more dangerous to walkers, horse riders and cyclists.
6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000s more visitors several times a year and the resultant traffic has not been taken into account.
7. There is insufficient employment available onsite so that almost all residents will have to travel to work. This will seriously add to the congestion on local roads.
8. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
9. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
10. I object to the removal of additional 3.1 ha from the green belt without any justification.
11. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
12. I object to para 21 which “limits” development in flood zone 2 and 3: development should be excluded in flood zone 2 and 3.
13. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
14. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
15. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
16. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2792  Respondent: 10871457 / Ronald Sainsbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
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  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/5775  Respondent: 10872545 / David and Rachel Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This development has been already refused planning by Guildford Borough Council and must not be allowed. Again the local infrastructure is just not able to cope with the potential of an additional 4,000 cars on local roads. This would have a hugely detrimental impact on to the villages of East and West Horsley, as well as the same problem outlined in item 3 of the overloading of roads, flood risks and added strain on station carparking, doctors surgeries and schools. This area is adjacent to one of the busiest and most accident generating stretches of the A3 as it joins the M25 and more traffic using this section would make matters worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2651  Respondent: 10872801 / Graham Philip  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the above planning application on the following grounds

• the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
• No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
• There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
• the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
• the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
• The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
• the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
• The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
• Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
• The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
• the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
• insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7511  Respondent: 10872801 / Graham Philip  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the above planning application on the following grounds

• the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
• No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
• There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
• the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
• the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
• The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
• the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.

The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

The issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

Insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2715   Respondent: 10872897 / Mike Prentice   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 aspect of the Local Plan relating to Wisley Airfield.

1. This development will lead to the urbanisation of Green Belt land, a precedent that will lead to urban sprawl towards Guildford.

1. Any developments in this area will increase traffic flow in an area that is already often congested with M25 and A3 junction. This congestion spills into local towns such as Cobham compromising the amenity for local residents.

1. Local public resources are saturated. GP’s surgeries, schools, police and transport are currently inadequate. Further population would require new resources.

1. Local towns would be overwhelmed with limited access roads, limited parking and would be less accessible for current residents.

1. To support any developments in the area of Wisley, Ripley and Send would require new shops and public amenities. This investment would need further development to justify costs, which would create out of town shopping areas. In turn this could reduce footfall in local towns.
1. Air pollution in this area is often poor being at the junction of M25 and A3. This section of the M25 is the busiest road in Europe.

1. Wildlife is profuse in these areas and any developments would impact them greatly.

1. With no public transport close to this area residents would be reliant on cars or buses. The roads in this area are unsuitable for larger vehicles or increases in volume.

1. Application 15/P/00012 was unanimously rejected by Planning Officers due to concern such the ones I have mentioned.

It is important that local views and expertise is respected and that the democratic process is respected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3476  **Respondent:** 10873377 / Rebecca Howard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

It is absurd that the Wisley Airfield site has been included in this draft plan. The planning application for this site was resoundingly rejected earlier this year and I cannot believe that this site has been included. Does the Council really believe that it would be sensible to build a new town in this location? Such a development would change the look and character of this area beyond all recognition. Taken together with the 485 houses proposed for the West and East Horsley sites, this would impose an unsupportable burden on the road network, drainage and sewage infrastructure, schools, medical services, public transport and parking.

I trust that my views will be fully considered and that the Council will have the maturity and common sense to revise the current Plan and ensure that the next version is based on sound, freely available evidence and fully incorporates the feedback of the Borough’s constituents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2619  **Respondent:** 10873633 / Monika Brewer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**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 draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning.
Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3130  Respondent: 10873633 / Monika Brewer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
2. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
3. Opportunity (3) should be common to all sites and is not unique to this site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5890  Respondent: 10874241 / James Grzinic  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the development of over 2,000 houses at Ockham Village. The impact on the narrow roads in and around our villages would be intolerable. The local train stations at Effingham and Horsley could not cope with any increased demand. I commute daily into London from Horsley, and the car park is already overflowing given current requirements, so I am intrigued to understand how the plan supposes the implicit, major increase in rail users will be accommodated within the existing infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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SITE A35 WISLEY. A very, very, very strong objection to this. It was rejected by the council already. I cannot see why it has been included. This is not a brownfield site, it is supposed to be a Surrey County Council waste site. A lot of good farming land will be lost which will have an enormous effect on the local wild life. The extra number of cars the 2000 homes will have on the A3/M25 and local roads will be enormous there are already traffic jams at the A3 Wisley roundabout, and M25 junction 10 roundabout, often made worse when the RHS gardens have a special event on or even in school holidays. In order to give the proposed residents of the new town access to the Southbound A3 the proposal is to make Old Lane from Effingham Junction one way from its cross roads with the Ockham - Cobham road. this will allow entry onto the A3, but not exit. Exiting onto the A3 here is slow and can be dangerous as you are faced with two lanes of traffic coming fast from the motorway roundabout, followed immediately by another two lanes of fast moving traffic coming off the westbound lanes of the motorway. If lucky you can get out before the next lot of fast cars arrive. I can see long queues. I also object strongly because many people come off the motorway to get home to Effingham Junction, Horsley and also Bookham. If the road is one way they will have to drive through East Horsley to get where they want to go. I also object to the road closures they want to make. I object to this plan because there is no public transport. Both car parks at

Effingham and Horsley stations are already full each day. The flooding that occurs often as you approach the A3 roundabout from Ockham/East Horsley will be worse as water runs off roofs and roads. Where will the sewage go. Who will have to pay for the cost of building a new treatment plant. Last but not least there will be an unacceptable increase in air pollution. These are all my objections to the proposed draft plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3819  
Respondent: 10874273 / Margaret Pearce  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site Policy A35. The council have already rejected building planning for the Wisley site on fourteen reasons, one of which is because it is in the Green belt. I cannot see how they can now include it on their new revised local plan. I object to the inclusion of building on the Wisley site. Policy D1. I object to the inadequate provision of infrastructure investment as I have stated before. I shudder to think of the increased traffic queues in both directions along the A3 and M25 junction, and on the great increase in air pollution which is already high in this area. I also object to the fact that they want to close some of our local lanes and make others one way. Finally I repeat again that I strongly object to the latest draft of the Guildford Borough Council local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3233  
Respondent: 10875969 / Valerie Austin  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield from the Green Belt

I object to the impact that such a development will have on the enviromental and ecological value of the site.

I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee

I trust that these objections will be fully considered and that the Former Wisley Airfield,(Three Farms Meadows), Allocation is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3745  
Respondent: 10875969 / Valerie Austin  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Once again I object to the above plans for many reasons, too numerous to list.

The major objections I have are:

1. The proximity to the A3 and M25 that are heavily congested even now.
   
The narrow lanes around Hatchford, Downside, Ockham and Cobham will have to cope with even more traffic in addition to the heavy use by cyclists and horse riders. Walkers, already restricted, will have little chance to enjoy their local area. Any problems with traffic flow on the above road and motorway aways results in streams of vehicles diverting onto the local lanes.

2. I object to the higher level of air pollution that will result from the addition of the houses and flats and their associated vehicles.
   
Pollution levels are way above European recommendation already and a worry for people living in this area.

3. Local facilities such as schools, doctors' surgeries, shops, railway stations and their car parks are already over subscribed.

4. I object to the use of the Green Belt and the subsequent threat to wildlife.

5. The proximity to RHS Wisley where visitor numbers have increased dramatically over the last few years and will continue to do so as Wisley expands its facilities and events.

To sum up, I believe this plan is unsuitable for the location and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposals for the Wisley airfield site (site A35) - totally disproportionate in size to the surrounding settlements and too dense relative to surrounding areas. There is a real risk of "them and us" emerging given the strength of local feeling against this development. I think it could cause real unrest in the area and potential discord between new and old residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Wisley Airfield, so called during the war, was to be put back to farm land, it is therefore not to be used for housing. If this does take place, the whole area will suffer from over crowding, the roads, high pollution levels, schools, doctors surgeries, etc. also it is a high area, very windy and not suitable for housing. We cannot cope with more traffic. The Guildford bye-pass is always at a stand still around 4.0 p.m. backing up all around. The M25 is impossible to get on to and then sometimes at a stand still as well. Trains are so full sometimes impossible to get on . How can we possibly expect to accommodate more people when we do not possess the infrastructure.

I agree we do need more housing, but this should be where they can lay new railways and roads to London and around, away from the already congested SE, or Brown field site within towns and cities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The former Wisley airfield is entirely unsuitable for use as a new ‘town’. The site was requisitioned by the Government for wartime purposes with a promise that it would be returned to agricultural use in due course - that promise should now be honoured. The land is Metropolitan Green Belt land except for about 15% consisting of the old concrete runway and apron.

A planning application for temporary use of the site for filming was rejected in 2014 and later refused on appeal, the Inspector stating that the development would be detrimental to the Green Belt and would likely cause harm to local environmentally sensitive sites. A much more substantial planning application for a small town of some 2,100 homes, medical centre, schools and supermarket was last year submitted by the owner, Wisley Property Investments, but was recommended for refusal by the Council officers and then rejected unanimously by a special meeting of the Planning
Committee, who totally agreed with the 14 main reasons for refusal by the officers. I will not list all the reasons here because the Inspector will have access to the Council’s files, but my objections include:

- loss of Green Belt
- loss of good quality agricultural land
- danger to nearby environmentally protected sites
- totally unacceptable traffic problems, including dangerously high pollution
- no infrastructure and no transport links (except A3)
- overdevelopment and unacceptable housing density
- five-storey buildings, totally out of keeping with the Surrey countryside
- detrimental impact on Surrey skyline and increase in light pollution.

I will emphasise the traffic problems this development would cause. Some 4,000 cars would be added to the area’s roads, causing more congestion on the A3 into Guildford and at the junction with the M25 (J10), where pollution levels often exceed permitted levels already and are too high to allow schools to be built on the site. The proposed new A3 junction at Wisley would have to accommodate a large increase in traffic from all directions, while Ripley and East Horsley would be seriously affected.

The fact that the scheme involves local road closures and one-way streets is a clear demonstration of how impractical the scheme is.

The Council’s comprehensive rejection of this scheme renders any large-scale development of the site out of consideration: it is not practical, viable or sustainable. Indeed, the Council’s Leader and Lead Councillor for Planning said the scheme failed the Council’s sustainability test ‘dismally’. Why, then, has the Council not removed the site from the Local Plan which would be logical in light of its fundamental unsuitability? I merely point out that Wisley Property Investments has links to the Conservative Party, including its ‘front man’ who happens to be the lead councillor for planning for the Conservative-controlled Vale of the White Horse District Council in Oxfordshire.

The site should continue to be used for agricultural purposes, while the runway and apron could be used for a solar farm or for hydroponic horticulture (no need to remove the eight-foot deep concrete at great expense).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
application for a new ‘town’ was thrown out by the Council’s professional planners who cited 14 compelling reasons for refusal, a decision upheld by the Planning Committee whose elected councillors voted unanimously against it.

b) In a report for the Council, consultants AECOM considered the sustainability of the larger proposed sites for development in the Plan and concluded that the Wisley site was the least sustainable, awarding it eight red flags. Yet in arriving at the 2017 Plan, the Council removes a site near Normandy and Flexford, rather than the Wisley one, even though it scored better for sustainability.

c) The Wisley site has a questionable history involving Conservatives and their supporters and backers. It was bought by Wharfland Investments who wanted to build a green recycling centre there. Its directors included a former Conservative cabinet minister, a property developer and a Conservative lead councillor for planning for an authority in Oxfordshire. Around 2012 when Guildford decided to earmark the site for possible development, Wharfland went into liquidation and the Wisley site was sold to Wisley Property Investments, a company registered in the Cayman Islands tax haven. A coincidence? Because of the secrecy surrounding tax havens, it is not possible to identify the company’s directors, but for the past few years the Oxfordshire councillor has been acting as the front-man for Wisley Property Investments. It is also believed that the development is being supported by a hedge fund manager with possible links to the Conservative party. A public inquiry into the refusal of planning permission is due to be held in September, after which it will be called in by the Communities Secretary, a Conservative, of course.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 
I OBJECT to the proposed development at Wisley airfield. The addition of 2,000 houses only two miles away would put an impossible strain on local amenities and roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7573  Respondent: 10877921 / Susan Prentice  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 aspect of the Local Plan relating to Wisley Airfield.

1. This development will lead to the urbanisation of Green Belt land, a precedent that will lead to urban sprawl towards Guildford.

1. Any developments in this area will increase traffic flow in an area that is already often congested with M25 and A3 junction. This congestion spills into local towns such as Cobham compromising the amenity for local residents.

1. Local public resources are saturated. GP's surgeries, schools, police and transport are currently inadequate. Further population would require new resources.

1. Local towns would be overwhelmed with limited access roads, limited parking and would be less accessible for current residents.

1. To support any developments in the area of Wisley, Ripley and Send would require new shops and public amenities. This investment would need further development to justify costs, which would create out of town shopping areas. In turn this could reduce footfall in local towns.

1. Air pollution in this area is often poor being at the junction of M25 and A3. This section of the M25 is the busiest road in Europe.

1. Wildlife is profuse in these areas and any developments would impact them greatly.

1. With no public transport close to this area residents would be reliant on cars or buses. The roads in this area are unsuitable for larger vehicles or increases in volume.

1. Application 15/P/00012 was unanimously rejected by Planning Officers due to concern such the ones I have mentioned.

It is important that local views and expertise is respected and that the democratic process is respected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The development of the Wisley airfield site in Ockham would have an absolutely massive impact on the area, entirely changing the environment for existing residents and blighting daily life for all concerned. Public facilities are already overloaded. The heaviest impact would fall on the most vulnerable, especially the elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

9. I OBJECT to the proposed Wisley Airfield development. This would result in the creation of a new town and the destruction of the character of one of most picturesque and historic areas of the country. Furthermore, the proposed development would increase significantly the load on already inadequate local infrastructure, including that in East Horsley, and would overstretch the Horsley and Effingham Junction railway stations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object for the following reasons:

1. **We should not allow building on green belt land**. We should protect this land because:

   1. It provides the area with valued natural beauty and rural character
   2. It provides a needed break up to urban sprawl – important given the high areas of pollution in the area
   3. It provides natural habitats for local wildlife that should be valued and taken care of

1. **The plan will magnify and worsen current shortfalls in existing infrastructure**. The allocation of housing to Ockham, Ripley, Horsley and Effingham and the 2,000 new homes at the former Wisley Airfield is hugely disproportionate and will adversely impact of the communities of the borough of Elmbridge. For example, the large number of new inhabitants of the proposed new housing will:
1. Take traffic congestion beyond breaking point. Elmbridge roads, particularly at key intersections such as the Painshill junction, are already very overcrowded, particularly at rush hour. It is unthinkable to make this problem worse however a deterioration of the situation is inevitable since residents of the new planned housing will produce an estimated 4,000+ cars and will have to pass through these areas to commute or to shop/socialise.

2. Take parking problems beyond breaking point. This is because residents of the proposed new development will be relying on existing car parking provisions at Elmbridge shops and rail link services. The car parks at the two nearest stations are already at capacity at peak times, and there is no overflow area to cater for the huge numbers of potential additional residents. It is also true that a simple trip to the local shops (which the 2,000 residents of the Wisley airfield would be looking to use) can already involve long queues to park e.g. at Waitrose, since at peak times spaces simply run out. 4,000+ cars-worth of new local shoppers will make this intolerably worse.

3. Taking public transport problems beyond breaking point. Local train services are already hugely overcrowded. I commute daily from Cobham and can confirm that in spite of recent improvements, rush hour services are still commonly full/standing-room only. The idea of a large volume of new commuters joining these services is crazy. There is genuinely no space. The planning department is either naïve or wilfully negligent to recommend that residents at Wisley could drive to Cobham station– this will be terrible for roads, parking and the train itself, all of which are at capacity already!

4. Take local services beyond breaking point. We do not have adequate local services, e.g. doctors surgeries, to cater for the large increase in population density. It is already impossible to get an appointment on the day unless you queue outside the surgery for 30 minutes before it even opens and are willing to wait for in excess of an hour.

1. The plan will create an unacceptable level of pollution. The level of pollution in the area is already in excess of legal limits. This level of pollution puts the health of local residents at risk and it would be madness to build a school in the midst of such high pollution. I am a liability underwriter by trade and would point out that in future, the planning department would very possibly be found negligent for wilfully ignoring pollution guidance and expressly allowing this problem to be worsened. Should local residents and particularly new schoolchildren develop pollution-based illnesses, it would not be unreasonable to expect local planners/developers to answer to why they ignored all reasonable pollution guidelines and exposed injured parties to foreseeable health risk. This is GBC’s responsibility and you are liable for the wellbeing of the communities you represent and/or impact with your decisions.

Overall, the project will damage the area. It will damage the quality of life of its residents. Local infrastructure cannot support the increase in population density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6354  Respondent: 10881217 / Ben Stevens  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the vast development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) Allocation, A.35: for the phased development of a new settlement of up to 2100 dwelling

I am writing to object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 3% of the population of GBC).

- 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.

- I object to the detrimental impact on transport, local roads and road. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  1. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

2. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

1. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

2. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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 Council. 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Officers, who cited the same grave concerns highlighted in this letter.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I would like these objections to be fully considered and for the Wisley Airfield (Three Farms Meadows), Allocation A35, to be removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/3288  **Respondent:** 10882465 / Colin Bowes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

TFM Allocation A35 has already been unanimously rejected by the planning authorities on numerous counts. It is a waste of resources – paid for by the electorate via council tax - to maintain this site in the local plan. I am profoundly concerned that the council has failed to remove this site from the local plan even though it received thousands of objections from local residents and statutory consultees.

Assumptions and claims made in the plan regarding Allocation A35 are unsound. Regarding traffic increases, the site is adjacent to the most consistently congested stretches of strategic road network in the county and close to one of the most...
congested junction in the country (J10). I had to use this junction for years on my commute to work, and it is frequently at a standstill during rush hours, accidents, diversions or roadworks. To suggest using bus services is disingenuous. The buses either travel the already congested main roads, or travel on unsuitable minor roads – thus reducing the likelihood of pedestrians or cyclists wanting to use these same minor roads. Furthermore, it is next door to Wisley RHS Gardens where following recent upgrades and extensions visitor numbers will increase by 500,000/annum and this associated traffic increase from the RHS has not been taken into account. I object to the transport evidence base which is unreliable.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights and timings. The inclusion of A35 will not contribute to the 5-year housing projection due to this and other constraints notably sewerage capacity.

This is Green Belt Land, and Green Belt is there for a reason. Many councillors and national politicians have made election promises to protect our Green Belt. The removal of an additional 3.1 ha from the green belt without any justification is just not morally right. The increased area of the TFM site now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area. The increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB. I object to paragraph 22 as this does not reflect the impact of the buildings on the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/785  Respondent: 10882785 / Stephen Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1253  Respondent: 10883553 / Steven Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )
No regard for smaller local villages, this settlement will dwarf them all in size and change local area forever. The infrastructure- particularly schools and hospitals - has not been sufficiently expanded to account for the 2000 extra homes.

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:</th>
<th>PSLPS16/6604</th>
<th>Respondent:</th>
<th>10883585 / J M Starr</th>
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I write to object to the inclusion of various sites suggested for housing and limited infrastructure, within your most recent local plan, but in particular to the inclusion of the former Wisley airfield. On almost the same day as the Council planners rejected unanimously the inclusion of this area, it is still included in your latest plan. Why? It must be painfully obvious to the entire Council that there is no possibility of sufficient infrastructure to accommodate development of this site, either now or at any time in the foreseeable future. The roads within reach of this site are incapable of supporting any additional traffic, including both the A3 and M25.

It must surely also be obvious that there are already insufficient primary or secondary school places available nor the means to transport pupils along narrow country lanes to any existing school which might be built elsewhere. The only two railway stations within normal reach have absolutely no spare parking facilities and nobody in their right mind would attempt to walk or cycle to either station along such dangerous country lanes.

It beggars belief that you are proposing to more than double the size of Ockham, Wisley and Ripley combined with your latest proposals for this area and I object in the strongest possible terms.

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:</th>
<th>PSLPS16/5751</th>
<th>Respondent:</th>
<th>10883713 / Matthew Howse</th>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

   1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

   1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

   1. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

   1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

   1. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1997  Respondent: 10883905 / Anita Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The infrastructure required to support proposed housing development in the villages to the north of the borough – Ockham, and the Horsleys, Ripley, Send, simply does not exist, and as such cannot possibly be created by cynical developers to such a huge scale. Roads, schools, railway network, drainage, parking, surgeries etc .etc. are already under huge pressure, as well you know. Moreover you have received many reports to confirm these inadequacies.

7. Your Planning Committee has already rejected proposed development at Wisley, (Three Farms Meadows) - where is the logic/integrity in continuing to include it in the Proposed Local Plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/514  Respondent: 10884129 / Chris Bingham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is more than enough brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban expansion from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is in fact more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Routes to the closest railway stations are not navigable by foot as there are no pavements and the unlit roads make cycling dangerous.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/3823</th>
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<th>10884129 / Chris Bingham</th>
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I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for numerous reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

- The associated traffic increase from the RHS has not been taken into account.
- The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
Opportunity (3) should be common to all sites and is not unique to this site

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the removal of additional 3.1 ha from the green belt without any justification

I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/61  Respondent: 10884481 / Ruth Gregory  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I believe that this has gone through consultation already and been rejected.

It still does not address the many issues highlighted in the previous consultation, nor does it make any reference to the fact that it was refused.

I still have concerns about the increase in traffic, the benefits to the local community and the actual ability of the planners to guarantee homes that will be affordable to the local population and not just to London commuters.

If you are planning to take the local villages out of the green belt due to the lack of green space around them, then this, and the other planned developments around this area, will help with this plan.

if you keep planning on building on the green areas and not considering the environmental factors then of course how can we consider them to be part of a 'green belt'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7115  Respondent: 10884737 / Peter Carrana  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield now known as Three Farms Meadows.

Allocation A35 for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft local plan for the following reasons-:

I object to the threat the local plan poses to the historic rural village and the blight on properties there.

I object to the detrimental impact on transport, local roads and road safety.

I object to the fact that insufficient consideration has been giving to the environmental and ecological value of the site.

I object to the continued inclusion of the site now known as Three Farms Meadow where the planning application has already been unanimously rejected by Guildford planning committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/3135  Respondent: 10884737 / Peter Carrana  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My response to the local plan submission with regard to the A35 site

I object to this development because it will add a further three thousand vehicles to local roads causing more pollution, noise and congestion. The impact on quality of life will be very serious indeed.

I object to the highly inconsistent green belt and countryside study, it is misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/7061  Respondent: 10892161 / Georgina Price  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This development has been already refused planning by Guildford Borough Council and must not be allowed. Again the local infrastructure is just not able to cope with the potential of an additional 4,000 cars on local roads. This would have a hugely detrimental impact on to the villages of East and West Horsley, as well as the same problem outlined in item 3 of the overloading of roads, flood risks and added strain on station carparking, doctors surgeries and schools. This area is adjacent to one of the busiest and most accident generating stretches of the A3 as it joins the M25 and more traffic using this section would make matters worse.
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport and parking facilities. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With regard to the proposed development of the former Wisley Airfield as I have stated before this appears to be being treated by Guildford Borough Council as though it was the development of a brownfield site. It is not. The clue is in the name, Airfield. It is or at least should be a field in the Green Belt if the agreement with the original owners to remove the runway when it closed had been enforced as it properly should have been. This is therefore just a proposal to build on a large area of the Green Belt with no exceptional circumstances involved and should be rejected on that basis. Notwithstanding that it is a completely inappropriate development of the land concerned both as to scale and nature and would put completely unacceptable pressure on local facilities e.g. roads, sewage, water etc

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6877  **Respondent:** 10897953 / Janice Hughes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**PROPOSED WISLEY DEVELOPMENT**

It is noted that GBC previously rejected the proposals. I too also objected to what was proposed at the time. One of the main concerns I had was the access & the assumption that the existing country lanes & roads could cope with the amount of traffic generated by the new development. Clearly they could not and this was a major flaw in the proposal.

However, I personally feel that if an adequate primary access could be designed directly off the A3, which would need access to both North & South bound A3 carriage ways, then this may assist. It is appreciate that this would involve a significant civil engineering project and significant cost, but that would need to be borne by the proposed developers of the site. If it could be established that there was clear evidence of a local need for housing in that location, then such additional costs can be taken to account by the Developers. Obviously there would be other planning considerations to also take into account. One potential advantage of a Development at Wisely would presumably be that the necessary infrastructure could be planned for and form part of the development proposals. For example, a school, doctors surgery and perhaps even some local shops could be included and allowed for. This would help reduce the impact on the surrounding areas and also reduce traffic movement. In terms of potential impact on surrounding areas, a housing development at Wisely might be more desirable than trying to expand existing villages like Send or Ripley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6002  **Respondent:** 10898145 / Louise French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to Policy 35 Development at Wisley Airfield. This has already been turned down by planning officers for all sorts of reasons including lack of infrastructure, lack of roads, destruction of Green Belt etc, so why has it reappeared in the Local Plan? The ground is beautiful open country covered with wild flowers and providing habitat for many wildlife species. The houses planned will generate so much traffic on our country roads and the A3 and M25, already very overstretched. The village of Ockham would be overrun with polluting traffic. Why are the Councillors so determined to spoil our surrounding countryside?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to site A35 Wisley Airfield; the size of the planning is unsustainable for the location. It would be a loss of Green Belt, increased traffic on unsuitable country roads without proper infrastructure and local facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>PSLPS16/5491</th>
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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  - The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  - The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  - The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  - The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  - The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  - The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1700  Respondent: 10905185 / D White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Wisley Airfield still being included in the Plan when permission was refused in April.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7994  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to strongly OBJECT to the Guildford Borough Council Proposed Submission Local Plan 2016.

I thoroughly endorse the submissions set out in the East Horsley Parish Council Response dated 13th June 2016 (attached) and their letter of 4th July 2016, setting out detailed additional comments on Site Policy A35, ‘land at former Wisley Airfield, Ockham’ (also attached).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  EHPCC_Local_Plan_Response_130616.pdf (278 KB)  EHPCC_letter_re_Wisley_development_4July2016.pdf (3.5 MB)

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Comment ID: PSLPS16/4801  Respondent: 10910369 / Karen Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3397  Respondent: 10910433 / Linda Willis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I appreciate the massive amount of work this is entailing over many years but I have several objections:

1. I object to a 2000 house village at Wisley Airfield. This will cause traffic congestion for the whole area in particular Ockham, Ripley, East and West Horsley, Send, Effingham and further afield. This will cause Utter chaos on the A3 at the M25 intersection, Ockham and Ripley roundabouts and all villages between Cobham, Dorking, Merrow, Woking. There would be extra pollution at Jnctn 10 which is already at a risky level. There would be so many extra people and children that the Horsleys and surrounding villages would be unable to sustain without enlarged shopping areas, more schools and medical facilities. Not to mention trains and parking. This would make us an urban area and we are supposed to be in Green Belt’ which was never supposed to be withdrawn, otherwise it joins us on to London via Kingston and Esher in an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5235  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object specifically, to the inclusion of the former Wisley airfield. If this proposal is adopted, and the plans put forward by the Cayman Islands based company go ahead, Guildford Borough Councillors will be responsible for the destruction of village life in this part of Surrey, in direct conflict with the promises that were made to the people who elected them as their representatives. The volume of traffic, pollution and the loss of important habitat will all be the blight that is created. The fact that this corner of the borough, on green belt land, should be sacrificed so that questionable housing targets should be met is a betrayal. Should the plans for this site, along with Garlick's Arch go ahead, there will be 2,500 new houses in the area.
I object because I was one of many who attended the council meeting on 8th April 2016 in which the Planning Committee unanimously rejected the application put forward by Wisley Property Investments Ltd. It seems astonishing, therefore, that after serious concerns have been raised by a broad number of, sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency, this site is still considered to be suitable for inclusion in the Local Plan.

I object because the proposed building on this site would result in this part of Surrey becoming part of the urban sprawl from London. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to building on the scale proposed for this site as the impact on our road systems will be catastrophic. Many of the roads in the area are narrow, some only single lane. In addition to this, there are no pavements. The prospect of having an additional 4,000 cars using these roads each day is not to be countenanced.

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation and prove detrimental to the health of local residents.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

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 object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the draft Local Plan because Three Fields Meadows (former Wisley Airfield) should not be included in the draft plan and my detailed reasons for this are itemised below:

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the draft Local Plan because when certain councillors put forward their objections at the council meeting on 24th May 2016 they were told by the leader of the council, Councillor Spooner, that if the site was not accepted for inclusion in the plan it would mean that they would be responsible for other villages having to bear the brunt of such development. I fail to see the legitimacy of this argument. It also appeared that councillors were being warned to accept this draft plan or the villages they represented would be back in the frame. Is this the premise upon which the plan should be built?

I object to the draft Local Plan because considering this from an entirely cynical point of view, it may appear that the vast sums of money that would be involved should this plan ahead, have tipped the scales of justice. Certainly, those behind WPI have no real interest in the needs of people in the borough and have seen the profits to be made when purchasing green belt land cheaply and then attempting to have its status overturned so that they can sell that land, with outline planning permission, at a vast profit. I doubt that these people live in the area and, by their actions, show they have no love of the area, unlike those of us who live here. The voters of this borough elected its council representatives on the promise that they would protect the green belt. If they adopt this proposal, they will have reneged on this promise and, in doing so, failed their electorate.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect in order to save the countryside for the generations which follow.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2390  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Once again, I find that I must object to the Guildford Borough Councils inclusion of Three Farms Meadows in the 2017 Local Plan. As someone who attended the council meeting in which all proposed plans to develop this site were unanimously rejected for very good reasons, I find it hard to understand how it can still be included in this draft. As a resident of Ripley I know that if this development goes ahead, the very nature of this corner of the borough will be destroyed. I will render it nothing more than a suburb of London. The council seems to have no qualms about destroying the green belt which, by it's very nature, is designed to ensure that the urban sprawl is not allowed to simply go unchecked. This, along with other planned developments in Send and Clandon will result in the end of village life here. The villages will simply merge into a new town.

I have attended meetings and seen projected plans for the development of this area and believe that there is a cynical use of green belt land which can be bought cheaply but, once planning has been granted, can then be sold on for a premium. There are those who seek only to make a large profit. The real needs and wishes of the communities involved are simply ignored. Green belt is being exploited in preference to genuine brown field sites for this reason. Those who stand to make vast amounts from this site are registered in the Cayman Islands. They are not paying UK tax and have no interest in improving the lives of those of us who live in the borough.

My reasons for objecting to Policy A35, Three Farms Meadows, in the draft 2017 Local Plan are as follows:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.

12. Opportunity (3) should be common to all sites and is not unique to this site.

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

16. I object to the removal of additional 3.1 ha from the green belt without any justification.

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting taxpayers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

It is for these reasons, therefore, that I believe that this plan is not fit for purpose and I now await Guildford Borough Council’s response to my objections.

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? ( )

Once again, I find that I must object to the Guildford Borough Council's inclusion of Three Farms Meadows in the 2017 Local Plan. As someone who attended the council meeting in which all proposed plans to develop this site were unanimously rejected for very good reasons, I find it hard to understand how it can still be included in this draft. As a resident of Ripley I know that if this site remains in the plan and is developed in the way that has been suggested by the owners of the land, the very nature of this corner of the borough will be destroyed. I will render it nothing more than a suburb of London. The council seems to have no qualms about destroying the green belt which, by it's very nature, is designed to ensure that the urban sprawl is not allowed to simply go unchecked. This, along with other planned developments in Send and Clandon will result in the end of village life here. The villages will simply merge into a new town.

I have seen projected plans for the development of this area and believe that there is a cynical use of green belt land which can be bought cheaply but, once planning has been granted, can then be sold on for a premium. There are those who seek only to make a large profit. The real needs and wishes of the communities involved are simply ignored. Green belt is being exploited in preference to genuine brown field sites for this reason. Those who stand to make vast amounts from this site are registered in the Cayman Islands. They are not paying UK tax and have no interest in improving the lives of those of us who live in the borough. This seems to be happening on a national scale and is a disgrace.

My reasons for objecting to Policy A35, Three Farms Meadows, in the draft 2017 Local Plan are as follows:

**I object to the inclusion of this site in the 2017 Local Plan because** it will be adjacent to the most congested stretch of roads in the country, junction 10 of the M25. In addition to this, the neighbouring roads, many of which are little more than country lanes, which already carry a high volume of traffic, will be negatively impacted. Living in a narrow lane, which is already a rat run, I know only too well of the impact development here would have. When the increased traffic that is projected due to increased visitor numbers to RHS Wisley is added to this the result can only cause misery for those living here.

**I object to the inclusion of this site in the 2017 Local Plan because** alongside the very significant increase in traffic movements, there will be a very significant increase in air pollution. The quality of our air as a result of the heavy traffic on the M25 and A3 already fails to meet statutory limits. The increase in asthma, particularly amongst children in the area, is disturbing. As a child brought up here, I can attest that when I was a child asthma was unusual, not the norm as it has almost become today.

**I object to the inclusion of this site in the 2017 Local Plan because** the access to the train network from this site is highly problematic. The roads surrounding the development are little more than country lanes and the suggested solution, that commuters could walk or cycle to the nearest railway station, is ridiculous. To suggest a bus service to Horsley again is not viable. The prospect of walkers, cyclists and buses using these narrow roads is completely unrealistic.

**I object to the inclusion of this site in the 2017 Local Plan because** the increase in area is on the south of the site and faces the Surrey Hills ANOB. The projected building on this area, in places several storeys high, would be a true blot on the landscape of this protected area. The removal of a further 3.1 hectares of green belt land is totally unjustified and unnecessary.

**I object to the inclusion of this site in the 2017 Local Plan because** one of the major issues is the provision for dealing with the large amount of sewage that such a site will generate. This will prohibit the plan from contributing to the five year housing projection.

**I object to the inclusion of this site in the 2017 Local Plan because** the housing number and the fact that the council has not used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA.

**I object to the inclusion of policy S2 in the 2017 Local Plan because** it states that the figures in the Annual Housing Target Table add up to 12,426, when, in fact, they add up to 9,810. There seems no account taken of the missing 2,616. This anomaly suggests that the figures are not to be trusted.
I object to the inclusion of this site in the 2017 Local Plan because the council has failed totally to take into account all of the objections raised by those they purport to represent. This is to disregard the fact that they are our democratically elected representatives and have a responsibility to act upon the wishes of the electorate. The promise by those on the council when elected was to protect the green belt. This promise is being flagrantly broken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5728</th>
<th>Respondent: 10911265 / Alastair Cochran</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The inclusion of 2100 homes on this site would present an unbearable strain on the existing infrastructure and completely alter the nature of the surrounding villages.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. I doubt that any of these homes will be truly affordable to local residents and will lead to a further influx from surrounding areas and thus not meet the requirements of the local population.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. At present cyclists are already endangered by the number and speed of cars passing through the area and this will do nothing to improve the situation.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads which are already congested. At present the roads are in a terrible state with numerous pot holes and the council seems to do little to maintain them.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. In addition the council seems to show no support for measures to reduce traffic on the roads such as the provision of school buses which were once in place but have now been terminated.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I continue to object to the inclusion of Policy A35, Three Farms Meadows, in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site in this plan because of the constraints on the site and the physical location.
2. It is too far from railway stations.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10).
4. Local roads are at capacity particularly when the A3 is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 per annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. It remains unclear when/if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
10. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
11. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will adversely impact the views from the AONB.
12. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
13. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding rural area.
15. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees.
16. I object to the Proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
20. I object to the transport evidence base which has been criticised for using out of date modelling software and is therefore unreliable.
21. I object to the housing number which I believe is unsound.

I consider for the reasons listed above and other reasons, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5410  Respondent: 10911361 / D Ashby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I continue to object to the inclusion of Policy A35, Three Farms Meadows, in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site in this plan because of the constraints on the site and the physical location.
2. It is too far from railway stations.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10)
4. Local roads are at capacity particularly when the A3 is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 per annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. It remains unclear when/if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
10. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
11. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will adversely impact the views from the AONB.
12. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
13. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding rural area.
15. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees.
16. I object to the Proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
20. I object to the transport evidence base which has been criticised for using out of date modelling software and is therefore unreliable.
21. I object to the housing number which I believe is unsound.

I consider for the reasons listed above and other reasons, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to Guildford Borough Council Proposed Submission Local Plan

Although I live in Surbiton I drive every week to visit friends in the Borough

I OBJECT to the draft Submission Local Plan for the following reasons:

- I object to the proposal to take so much land out of the Green Belt; new housing should be put on the brownfield land in the urban areas of the
- I object to the proposed number of houses; it seems too
- I object to the proposal to remove the Former Wisley Airfield from the Green Belt; it separates Ripley from
- I object to the urban 2,000 house development being placed in the historic rural village of 159 homes in
- I object to more development which would have an impact on transport, local roads and road The narrow rural roads in Ockham and the surrounding area cannot cope with the extra traffic, which would increase the already severe congestion on the A3.
- I object to the continued inclusion of this site A35 where a recent planning application has already been unanimously rejected by the Planning

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification
8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
9. Opportunity (3) should be common to all sites and is not unique to this site
10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

12. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

13. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

14. It is further from railway stations than any other identified strategic site

15. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.

16. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.

17. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

18. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

19. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

20. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

21. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”

22. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.

23. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

24. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

25. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

26. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.

28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

29. I object to the Housing number which is unsound and open to legal challenge.

30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council (GBC) Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brown field land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths, the lack of pedestrian footpaths and the space to provide either, together with the pitiful state of the existing highways, which are currently dangerous for cyclists
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and demand for car parking at each station is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

- I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2341  **Respondent:** 10911617 / Peter P. Earle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for a number of reasons including:

1. This is the least sustainable site identified in both the current and previous versions of the Local Plan because of the site constraints and location.
2. This site is further from railway stations than any other identified strategic site.
3. The site is adjacent to the most congested stretch of strategic road network (SRN) in the county and close to one the most congested junction in the country (M25 -J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (in peak times and also due to accidents, diversions, roadworks etc)
5. Suggested public transport initiatives including bus services to and from Guildford will exacerbate the already over crowded road network leading to unreliability and delay, which in turn will make local residents choose individual modes of transport resulting in further congestion.
6. Public transport bus services to Horsley will reduce the safety of the local road network as lanes are narrow and this will increase danger to cyclists and walkers which should be encouraged as eco friendly alternatives. The area is greatly used by cyclists at all times throughout the year who seek to follow the 2012 Olympic cycle route and train for the annual Ride London –Surrey 100 cycle event. The current plan will add to traffic flows and endanger cyclists and walkers lives.
7. The proposed site is adjacent to the Royal Horticultural Society gardens, which is one of the most visited destinations in the south-east of the country. I understand that expansion plans the RHS have will significantly increase the number of visitors to Wisley. From reading the plan, the resultant traffic increase from the RHS has not been considered. Furthermore, there are regular events at the RHS which attract 1,000’s of additional visitors and again the impact of this increase in traffic does not appear to have been taken into consideration.
8. Once completed, there will be minimal employment opportunities on the developed site as a result of which, the majority of new residents will travel to work. The majority of these are likely to use motor cars (probably with only a driver) and this will add significant volumes of traffic to the already over crowded local narrow lanes.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the increased area of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

Please note that I reserve my right to attend the inquiry and personally present evidence.

As a further over arching comment on local and government policy, I do not understand why more emphasis is not being given to long term investment in developing other parts of the UK. It is evident that the South East and the London
conurbation in particular is over crowded. The answer is not to destroy the green belt but to encourage a shift in population to other areas which have been neglected by successive governments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Guildford Borough Council Proposed Submission Local Plan: Letter of Objection

Although I live outside the borough I keep my horse at stables in the borough and regularly drive to the borough to ride my horse out over the Bridleways on the Former Wisley Airfield and local areas.

I write to OBJECT to the draft Submission Local Plan and the inclusion in the Plan as a potential site for development of the Former Wisley Airfield for the following reasons:

• I object to a plan with 70% of new housing in the Green There is ample brownfield land in the urban areas of the Borough. The Green Belt should be preserved for future generations as was reflected in election promises to preserve the Green Belt.
• I object to the housing number of 693 houses per year which is far too It is the result of hidden calculations and has not been justified.
• I object to the proposal to remove the Former Wisley Airfield (FWA) and neighbouring land from the Green There are no exceptional circumstances to warrant removing the land from the Green Belt
• I object to this urban 2,068 house development being placed inthe historic rural village of 100 or so homes in
• I object to the impact on transport , local roads and road The proposed development would result in around 4,000 additional cars on the roads. This will increase the danger from traffic to horse riders, cyclists and pedestrians on the narrow rural roads in Ockham and the surrounding area. It will increase in the already very bad congestion on the A3 and M25.
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, particularly the Thames Basin Heath Special Protection Area (SPA) and the Sites of Special Scientific Interest (SSSI) and Special Nature Conservation Interest (SNCI). I enjoy on the airfield the song of the skylarks, which are an endangered species, and which will be threatened by the development
• I object to the threatened loss of high quality farmJand, currently covered by the fast growing maize crop..

Please remove the Former Wisley Airfield, site A35, from the Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7203 Respondent: 10912513 / Sarah Green Agent:
I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of cars resulting from a proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The increase in pedestrian traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I object to the fact that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
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:</th>
<th>PSLPS16/3072</th>
<th>Respondent:</th>
<th>10914561 / Bert Van Druten</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. 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. 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.

4. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

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   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I hope that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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 strongly object to the inclusion in the Local Plan of the former Wisley Airfield site, A35, also known as Three Farms Meadows. I live in Cobham, outside the Guildford area, but close to Wisley and directly affected by what happens there. My reasons for objection are as follows:

• The site is in the Metropolitan Green Belt and the proposed new town would severely affect the openness of the area and the views to and from the Surrey Hills AONB. There are no very special circumstances justifying this development. There are Brownfield and Urban sites still available in the Guildford area and these should be used.
• Development of the site would destroy this beautiful, quiet rural area and decimate the wildlife. It would overwhelm the hamlet of Ockham and the other little villages close to the site. It would create a ‘foreign body’ in the beautiful Surrey countryside. The intended density of dwellings and the four and five-storey buildings would be completely out of character with the area.
• There would be an unacceptable increase in light, noise, and air pollution plus an effect on the water table and flooding in the locality.
• The new population centre would place impossible strains on health services, schooling, public transport, and other facilities and infrastructure in and around the locality.
• There would be a dramatic impact on roads and traffic. As a resident of Cobham I am particularly concerned with the adverse impact the extra vehicles would have on junctions on the A3 and M25 and on the traffic jams we get in Cobham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4475  Respondent: 10915041 / Balazs Hegedus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I attended the meeting on 8th April regarding The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Ref: 15/P/00012) and this was unanimously rejected by GBC following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

(a) was an inappropriate development within the Green Belt;

(b) would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;

(c) failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;

(d) failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;

(e) was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
(f) would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;

(g) failed to deliver the required transport sustainability measures;

(h) failed to secure an appropriate provision of affordable housing;

(i) was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;

(j) would result in loss of the safeguarded waste site;

(k) presented a dense and urban form of development owing to its quantum and scale;

(l) had an adverse impact on the setting and significance of a designated heritage asset;

(m) had an unacceptable air quality impact;

(n) impacted on education infrastructure;

(o) impacted on policing infrastructure;

(p) impacted on health infrastructure;

So I was completely baffled when we went to the next meeting at the GBC Millmead, on 24th May, to be told that they were going to go ahead with the plan anyway!! So why are we continually writing our objections when they are completely ignored?

Anyway, I object very strongly to the submission of the local plan, specifically for The Three Farm Meadows (the former Wisley Airfield). I could rewrite my objections from all my previous emails/letters, but I cannot see that they will make a difference!!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>10915393 / Laura Cheese</td>
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</table>

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from
London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application
was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows) I am disgusted with the fact that it has even got this far. We need to protect the land around from developers who want to create massive villages in such a beautiful and natural area. It saddens me that we are destroying nature's home.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7440  **Respondent:** 10915681 / Karen Bushnell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object that a proposal for 2000 houses at Wisley Airfield ref A35 has been included in this plan again despite the very good reasons it was rejected in the 2016 consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/369  **Respondent:** 10916193 / Ann and David Harrison  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The possible development at Wisley Airfield, along with other local proposals, will put an unreasonable strain on local facilities – transport, traffic, parking, schools and medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5781  **Respondent:** 10916193 / Ann and David Harrison  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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2. There is not the infrastructure in place or satisfactorily planned to cope with the proposed developments, particularly if the plans to develop Wisley airfield go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6902  **Respondent:** 10917505 / Peter Cheese  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I am writing to object in the strongest possible terms to the Guildford Borough Council Local Plans to include the former Wisley Airfield for a major development of a new town. This proposal was unanimously rejected by GBC, and yet it is now being included in the Local Plan.

The plan would have 70% of new houses being built in the protected greenbelt and would destroy for ever the environment surrounding the small local communities of Ockham and Horsley.

I strongly object to the disproportionate allocation of new housing in this area with over 23% of the Plan for new housing being in the area of the Horsleys, Ockham, Ripley and Send, when today only 0.3% of the population living within Guildford Borough live there today.

I, like so many others who live in the area have consistently objected to these proposals on a wide range of grounds. I hope that you will take this and the many other objections being raised in to very serious consideration. A new town of this scale would inevitably absorb the local villages and set the precedent for creeping suburban growth and destruction of the greenbelt so close to London.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3776  **Respondent:** 10917505 / Peter Cheese  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object very strongly as I have done before to the inclusion of Three Farm Meadows in the Draft Local Plan. There are many reasons for the objection as have been put forward before and remain fundamental objections and reasons why this should not go ahead.

The area is Green Belt land and I object to the change in the Green Belt boundary to the eastern end of the site

It is a totally unsuitable site for development because of the constraints on the site and the physical location

The site is also very close to the most congested road network (A3 and M25) and most congested M25 junction of all (junction 10)
It is also adjacent to RHS Wisley where visitor numbers will increase by 500,000 per annum. So this means more traffic.

The roads around the three Farm Meadows are also totally unsuitable for any more traffic. They are unlit narrow and without pavements. There would not be sufficient employment on his site for people to work so people would have to travel by car/ walk/cycle along these unsuitable lanes.

The stations and schools are at their full capacity. No room for more cars in railway car parks and the site is further from stations than any other strategic site.

Any bus services will have to face the crowded SRN and this would result in unreliable services and delays.

These are just some of the many reasons why this site should not be included in the Local Plan. If this area were to be developed in ways that have been proposed and rejected through previous planning applications it would fundamentally alter the environment, landscape and community of the several small villages in the area for ever.

I along with many other residents and local people have objected many times, alongside other statutory planning applications, and the Council should remove this Three Farm Meadows Site from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4480  Respondent: 10918209 / Veronika Ferenczi  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I attended the meeting on 8th April regarding The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Ref: 15/P/00012) and this was unanimously rejected by GBC following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

(a) was an inappropriate development within the Green Belt;

(b) would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;

(c) failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;

(d) failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;

(e) was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.

(f) would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;

(g) failed to deliver the required transport sustainability measures;

(h) failed to secure an appropriate provision of affordable housing;
(i) was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
(j) would result in loss of the safeguarded waste site;
(k) presented a dense and urban form of development owing to its quantum and scale;
(l) had an adverse impact on the setting and significance of a designated heritage asset;
(m) had an unacceptable air quality impact;
(n) impacted on education infrastructure;
(o) impacted on policing infrastructure;
(p) impacted on health infrastructure;

So I was completely baffled when we went to the next meeting at the GBC Millmead, on 24th May, to be told that they were going to go ahead with the plan anyway!! So why are we continually writing our objections when they are completely ignored?

Anyway, I object very strongly to the submission of the local plan, specifically for The Three Farm Meadows (the former Wisley Airfield). I could rewrite my objections from all my previous emails/letters, but I cannot see that they will make a difference!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2581  **Respondent:** 10918369 / Kendall Collinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I think that the Ockham plan to develop the old Wisley Airfield makes sense in terms of being a substantial development on what could be classed a brownfield site. It is a wide expanse of tarmac and concrete adjoining the A3. This could helpfully be developed into a village and have amenities for social housing, a traveller site and could be developed in a stand alone way which would not affect the neighbourhood as a road would be made which could link to the A3. I understand that this is not your favourite as it will incur more expense as a road will need to be made. However, it is here that all sections of the community can have their housing needs met for the minimum of trouble to the neighbours and to the landscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7479  **Respondent:** 10918369 / Kendall Collinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I think that the Ockham plan to develop the old Wisley Airfield makes sense in terms of being a substantial development on what could be classed a brownfield site. It is a wide expanse of tarmac and concrete adjoining the A3. This could helpfully be developed into a village and have amenities for social housing, a traveller site and could be developed in a stand alone way which would not affect the neighbourhood as a road would be made which could link to the A3. I understand that this is not your favourite as it will incur more expense as a road will need to be made. However, it is here that all sections of the community can have their housing needs met for the minimum of trouble to the neighbours and to the landscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3903</th>
<th>Respondent: 10918657 / Angus MacDonald</th>
<th>Agent:</th>
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<tr>
<td>I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.</td>
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<tr>
<td>After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.</td>
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<tr>
<td>I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.</td>
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<td>Re Guildford Borough Council Proposed Local Plan (June 2016)</td>
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<tr>
<td>As a long term resident of Ockham I am writing to object strongly to the continued inclusion of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM), as a strategic site in the proposed new local plan.</td>
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<td>The latest planning application for FWA/TFM was unanimously rejected by Guildford Borough Council, on April 8th 2016, for very good reasons and this site should be removed from the local plan.</td>
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Section page number 570 of 1393
In particular I object strongly to the proposal to remove FWA/TFM from the Green Belt, which has a very important and well known role. No exceptional circumstances have been demonstrated. I object to the fact that not enough attention has been paid to the environmental and ecological value of the site.

Please take seriously the very large number of valid objections you will receive and remove FWA/TFM from 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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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object very strongly to the Proposed Local Plan and I support the objections to the changes in the Plan that have been summarised on behalf of the residents by Ockham Parish Council.

I object very strongly to the inclusion of the proposed development on Three Farms Meadow (A 35) in the Local Plan, for several reasons:

I object because of the appalling traffic congestion that would result on the A3 and on local roads from the development. The queues on the A3 around Guildford are already miles long twice a day on most days and the junction (10) with the M25 is already one of the most congested junctions in the county. There have been many serious accidents on these roads in the last two years

I object to building on the invaluable green belt. There are **no exceptional circumstances** for this site being removed from the Green Belt, as required by the National Planning Policy.

I object because of the increased pollution that would occur. The pollution levels on the A3 and near to the A3 are already far too high.

I object because this site is still included in the Local plan despite thousands of objections from local residents and statutory bodies, including Guildford Borough Council.

I object because the local station car parks are already full on weekdays. There is no way that dozens more people could park at Horsley or Effingham Junction stations.

I wish these objections to be fully taken into consideration and I strongly request that the proposed development on Three Farms Meadow should be removed from the Proposed Local Plan.

**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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<th>Respondent:</th>
<th>10919937 / Eileen Miriam Harris</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35- for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to: The assertion that the development will result in a meaningful shift to cycling and walking.

The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

The Village of Cobham attracts many visitors with its shops and restaurants and the most direct route from the area of Ockham is via Ockham Lane. This road was built for easy access to Cobham for use by the local residents, it is very narrow with no footpaths or cycling track and is only suitable for light traffic due to having very many bends and blind corners. It passes through Ratchford and a flood plain, it is very often closed due to flooding. The danger that any increase in traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) has to be considered.

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on due to start until 2019 at the earliest

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that 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.
I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Dear sirs

I wish to record my objections to these proposals on the following grounds:

- So far no exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.

- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

- I seriously object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

- I also object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

- The Local Plan as drafted poses a threat to the historic rural settlements of Ockham, Hatchford and Downside.

- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development. There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.

- There is a serious lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge and I know as a resident of that area that the roads simply cannot accommodate more traffic without serious consequences.

- I am very worried that the issue of air quality is not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

- I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/6908  Respondent: 10921025 / Tony Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Co-operate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to strongly object to your proposal to include the above application for 2,000 new dwellings within your local plan at the site of the former Wisley Airfield.

This site comes under the Metropolitan Green belt and I am not aware of any circumstances that justify its removal from it. The whole point of the Green belt is that it is protected land to prevent the spread of urban development destroying the natural countryside not to mention harming already endangered wildlife and ecologically sensitive areas that have been damaged by increased levels of traffic and subsequent pollution.

The addition of this development will have a severe impact on the already congested rural lanes and roads around the area, not to mention severely burden the small villages and station car parks already struggling to accommodate the high levels of parking required. There is already an application in place for RHS Wisley which will increase visitor traffic and this will be compounded by an additional 2,000 dwellings adding what could be as many as 4,000 cars to the road network, bearing in mind many modern homes and families have at least 2 cars per household, if not more.

I urge the Planning Committee to consider the detrimental affect a development of this magnitude will have on this rural area and the environment and reject the application forthwith.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3439  Respondent: 10923265 / Colin Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Co-operate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object also to the proposed development of Wisley Airfield.

Apart from proposals to add more house building in a village now bursting at the seams, the proposed development of Wisley Airfield with 2,000 houses makes a mockery of the planning and development process. What common sense if any is used to impose such a burden on communities that are barely coping now. The local infrastructure simply cannot cope.

Development of Wisley Airfield as proposed should be removed from the Local Plan. Common sense should prevail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3470  Respondent: 10923265 / Colin Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Co-operate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3471  Respondent: 10923265 / Colin Lewis  Agent: 10923265 / Colin Lewis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.
I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5695  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPS16/417</th>
<th>Respondent: 10924001 / AA Bailey</th>
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<tr>
<td>For example, planning for a new town on the former Wisley Airfield &quot;Three Farm Meadows&quot; was unanimously rejected by Guildford planners and then directly put into the Local Plan. This makes the system and procedure a nonsense.</td>
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<tr>
<td>I write with specific concerns about the local plan. I firmly object to the inclusion of the former Wisley Airfield. Three Farm Meadows Foremost is a green belt site which was promised return to agriculture. No consideration has been taken into account of its SPA SSSI &amp; SNCI status within the Thames basin</td>
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<td>The local infrastructure is at full capacity – new road configuration of narrow often flooded lanes would cause chaos to the whole area</td>
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<td>There are no exceptional circumstances to allow the construction of a high rise town in a rural historic village of 150 residences 2000 homes is disproportionate. Again no consideration has been taken into account for public transport already congested railway stations further heavy traffic with excessive pollution.</td>
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<th>Comment ID: PSLPS16/4378</th>
<th>Respondent: 10924161 / Victoria French</th>
<th>Agent:</th>
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<td>I write with specific concerns about the local plan. I firmly object to the inclusion of the former Wisley Airfield. Three Farm Meadows Foremost is a green belt site which was promised return to agriculture. No consideration has been taken into account of its SPA SSSI &amp; SNCI status within the Thames basin</td>
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<td>The local infrastructure is at full capacity – new road configuration of narrow often flooded lanes would cause chaos to the whole area</td>
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<td>There are no exceptional circumstances to allow the construction of a high rise town in a rural historic village of 150 residences 2000 homes is disproportionate. Again no consideration has been taken into account for public transport already congested railway stations further heavy traffic with excessive pollution.</td>
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I have worked at RHS Garden Wisley for nearly 10 years, and have lived in Surrey all my life, at contrasting locations such as Croydon, Dorking and Haslemere. I have personal experience of the housing market as a Surrey resident, as do my children. I earn below the national average income and choose to live here because it is beautiful, even if it means sacrificing some life-style choices. I do not want to see this area ruined and become suburban sprawl and a biodiversity desert. I have not seen prices in the rental and buying market rise very much at all over the last five years - indeed I believe they have just fallen following the brexit vote. The devaluing of the pound has suddenly made us an even more attractive market for foreign investment: this is trend does not support the apparent housing problem. We've yet to see the effects of the buy-to-let changes. The Green Belt is as necessary here as the parks are to London. I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
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  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Agent:</th>
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<td>I object to the inclusion of the site at Wisley Airfield (known as Three Farm Meadows) because the planning application has already been rejected by GBC’s Planning Committee for very good reasons.</td>
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| • I object to the continued inclusion of Three Farm Meadows at Wisley despite it being rejected by the council’s Planning Committee.  
• I object to the changes made to the plans for Three Farm Meadows as they still do not address the problem of the lack of infrastructure and local services. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

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<th>Comment ID: PSLPS16/3678</th>
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<td>I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt</td>
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|                           | }
Site A35 - Wisley

I object to the large proposed development of 2,000 houses at Wisley Airfield as it will destroy large areas of Green Belt and agricultural land and produce massive congestion on the A3 and surrounding roads including Ripley and Send.

To conclude: the draft Local Plan represents a terrible sentence for our villages. We are destined to become a victim of urban sprawl based on an exaggerated housing need. NPPF states that the Green Belt should only be altered in “exceptional circumstances.” There manifestly are no exceptional circumstances in Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I object to the fact that the crime rate will increase and my safety compromised.

I object that the already overstretched NHS resources will not be able to cope with all these extra people.

I object to paying a very high Council tax to live in a rural pleasant environment which will now prove to be poor value for money.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to:

- the removal of the Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to Three Farm Meadows, an area that at present has only 0.3% of the population of GBC).

- the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.

- over 70% of new housing being built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate, as above, are being ignored.

- Insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1548  Respondent: 10927137 / Mary Pargeter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield (FWAJ, now known as Three Farm Meadows (TFM). Allocation A35- for the phased development of a new settlement of up to 2100 dwellings

I object to local plan which still includes the above site at the Former Wisley Airfield/Three Farms Meadows. Despite overwhelming objections from the public and the application being unanimously rejected by GBC, this site remains on the local plan.

The Government advice states 'The Green Belt should only be altered in exceptional circumstances through the local plan process and the support of the local people. Demand for housing alone will not change the Green Belt.’ The inclusion flies in the face of this edict.

The proposed plan does not have the above support or 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:

- access to the countryside and clean air and
- the peace and quiet afforded by wide open Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the Three Farm Meadows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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TRAFFIC AND HIGHWAYS

From the severe alterations required to the road network it is obvious that the size of this development is inappropriate for the location.

- the re-routing and one way systems would entail long detours to reach nearby locations and extra traffic (estimated 4,000 cars) would increase noise and This is a unreasonable imposition upon existing residents and obviously affects Ripley, Horsley and Cobham and all of their adjoining minor and major highways.
- Southbound traffic to the A3 would be forced through Ripley High Street, already heavily congested at Newark Lane in the rush Traffic joining the A3 from Old Lane, a dangerous junction with fast traffic joining the A3 from the sliproad, would back up.
- Junction 10 on the M25 is already heavily backed up at peak times and the pollution levels already exceed the European safety standard.
- The lack of suitable public transprt. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
- the assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
- the danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the inclusion of Three Farms Meadows in the draft Local Plan. This application was turned down unanimously at the planning committee meeting. Thousands of letters of objection were received. However this has all been ignored by the Council by refusing to remove this development, which appears to have been added as a direct copy from developer's layout of the site. I have written to object several times and wish that those comments are passed on to the inspector.

In summary:

- green belt infringement or removal.
- adjacent to already heavily congested road system of M25 and A3 junction.
- pollution levels already exceeded.
- increase of estimated 4,000 cars narrow country lanes unable to cape, car parks.
• already full at railway stations.
• closure and rerouting of neighbouring lanes.
• Infrastructure of sewer system unable to cope with existing demands - surcharging already occurs.
• ruination of historic village of Ockham.
• out of scale and proportion to this rural location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/3548</th>
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<td>We also object strongly to the development of a New Town at Wisley Airfield. It is in clear contravention of Green Belt policy and would have devastating impact on the countryside, its wildlife and on the surrounding villages.</td>
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<td>Why is the Wisley Airfield project still in the Plan? It was widely rejected by planners and is almost universally objected to by local residents. It would be catastrophic for the area and we object to it still being in the Plan.</td>
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<td>The Plan fails to acknowledge the already stretched infrastructure and it completely fails to meet the objective of providing infrastructure to support new development. Who is going to pay for all this?</td>
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From experience (daily), I can assure you that the roads in Ockham, Ripley are already completely congested. Between 7.30 and 9.30 am it is hardly possible to go anywhere, as Ripley and the A3 are completely congested at that time. Also, if we would like to travel by train, there is hardly any or no parking space left at Effingham Station.

In your plans you mentioned other train stations like Weybridge, Woking, Cobham, which will take you an hour to get there during rush hour.

An increase of approximately 4000 cars would make life impossible as it will completely clock up the roads. I speak from personal experience as I drive my children to school every morning and my husband uses the train from Effingham.

Nowhere in your plans have you explained how you will solve the infrastructural issues. Just creating an access road to the A3 round-about in Ripley will not solve this issue as this round-about to enter the A3 is already congested during working hours and in addition to that if you would like to go through Ripley the road is also congested.

In our area there are also lots of tractors, horses and cyclists on the road. If you will increase the traffic with about 4000 cars, you should think of an A&E station or an ambulance on stand-by for 24/7 as it will create dangerous situations on the already narrow roads.

Also, the submission plan is unreliable due to some errors in the plan, the poor quality and lack of transparency in the evidence base and the accessibility of the evidence base.

I furthermore would like to stress that It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location. Also the site is further from railway stations than any other identified strategic site and it is on the the border of the most congested road network in the county and close to one the most congested junction in the country (J10)

Any public transport provision such as bus services to/from Guildford will be negatively affected.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. As already mentioned: this is totally unrealistic and unsafe!!

The site is also on the border with RHS Wisley, which is the most popular visitor attraction in the south-east and visitor numbers of this attraction will increase by 500,000/annum.

Furthermore, and very important to us: we object to the increased area of the site as this now abuts additional heritage assets, including our house: Bridge End House and Upton Farm The increased area will negatively impact the setting of our house and Upton Farm.

Also, I object to the removal of additional 3.1 ha from the green belt without any justification

And what I do not understand and very much object to is the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I consider for the reasons listed above and many other reasons that this plan is unsound, unreliable, unacceptable and not suitable.

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I do not see the purpose that I have to keep writing these objections again and again as it should be enough to explain to you once. But apparently it should be explained to you over-and-over again in order for you to finally realise that it lacks clarity (which is very clear) and evidence (also very clear) and hat it is just not suitable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to the Guildford Borough Council Proposed Local Plan (June 2016) and, in particular to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings, and the erosion of greenbelt land in East and West Horsley.

I object to the draft Local Plan for the following key reasons in respect of Three Farms Meadows:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I object to the draft Local Plan for the following key reasons in respect of East and West Horsley:

1. I object a plan that removes East and West Horsley from the Green Belt.
2. I object to a plan that includes 533 new houses in East and West Horsley.
3. I object to the erosion of farmland
4. I object to a plan that will destroy the beauty of the village in which I live.

I trust that these objections will be fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/835  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Three Farms Meadow site

I OBJECT also to there-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. 17 This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision - a clear signal to the developers to try again.

This is not an NPPF ”presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. “18

Policy A35 should be ditched from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of ”exceptional circumstances”.

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• Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
• Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
• Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

“17 Application reference 15/P/00012.

“18 Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Han. Charles Balfour (director, descendant of the Tory Prime Minister).

• Absence of adequate traffic data.
• Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
• Loss of high-quality agricultural land (55% of the site), in breach of national policy.
• Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
• Presence of a Surrey County Council safeguarded waste site.
• Cost of infrastructure required to the detriment of alternative more favourable sites.
• Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
• Impact on listed buildings.
• Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
• Extreme housing density with tiny garden spaces.
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14). 19
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

*****

“19 The River Mole would flood even more badly should a new runway be built at Gatwick.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/829  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. Three Farms Meadow site

I OBJECT also to there-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision - a clear signal to the developers to try again.

This is not an NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be ditched from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of "exceptional circumstances".
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

17 Application reference 15/P/00012.

18 Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).

- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA. Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

19 "The River Mole would flood even more badly should a new runway be built at Gatwick."

*****
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7391  Respondent: 10934689 / Adam Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send. The A3 is already at capacity in this area and causes major delays accessing the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6971  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to a deaf audience. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. Some residents have concluded that commenting is a waste of time.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.13

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village – essentially, a soulless new dormitory town. The Horsleys feel victimised by this plan, which has been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.14

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.
Under the plan, rural West Horsley will take 35% of new homes, Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than sneaking in site proposals as a fait accompli.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council’s Education Review says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan, but Surrey County Council has no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not improve it.

13 E.g. Gallagher Homes v Solihull Metropolitan Borough Council [2014] EWHC 1283
14 Councillor Paul Spooner and his predecessor, Councillor Stephen Mansbridge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6972</th>
<th>Respondent: 10935201 / Cathryn Walton</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with 2,100 new homes only 2 miles away (see below).

I OBJECT also to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee recently rejected a recent planning application for precisely this development was unanimously on 14 separate grounds.15 This deceived many residents into thinking that it has been defeated: scandalously, the site had been included in the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers that they should try again.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given additional months to refine their application. Residents are disturbed by apparent party links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.16

Three Farms Meadows before WW2 was a valuable agricultural asset to the UK. It still is. It grows enough wheat for 1 million loaves of bread.

The hamlet of Ockham gladly helped the war effort by allowing the fields to be used for the defence of the realm on the understanding and promise from HM Government that after hostilities ceased it would be returned to farm land and the
hamlet to a quiet rural existence. For their loyalty to King and country the villagers have been let down and subjected to the threat of the engulfment of the hamlet and the end of their peace and quiet as well as the loss of a valuable food production resource that the country needs to be self supporting (UK only produces half of what it consumes as food. - 2015).

Ockham is a historic place. The home home of ‘Willium of Occam’ philosopher and author of Occam’s Razor. Ockham is the home of ‘Ada Lovelace’ the world’s first computer programmer (now on the UK passport) The site of ‘The Ockam Hoard’ a Bronze Age Hoard of bronze axe heads and jewellery now at the British Museum. The hamlet is a Grade 1 listed architectural treasure and must be protected.

Please remove Three farms Meadows from the Local Plan immediately.

Policy A35 should be summarily removed from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”;
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it;
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA);
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts;
- Absence of adequate traffic data;
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school;
- Loss of high-quality agricultural land (55% of the site), in breach of national policy;
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households;
- Presence of a Surrey County Council safeguarded waste site;
- Cost of infrastructure required to the detriment of alternative more favourable sites;
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity;
- Impact on listed buildings;
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA;
- Extreme housing density with tiny garden spaces;
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure;
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames;
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

15 Application reference 15/P/00012.

16 Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re objections

Has anyone seriously considered the total destruction of a village Not including the proposed 2000 houses at Wisley airport and taking the proposed appx 600 houses

Assuming minimum of two people per dwelling and possible one vehicle per house. The very minimum

What services such as doctors surgeries, shops etc have been considered

On the subject of considerations, lets specifically mention Ockham Rd North and South. This Road is already too narrow with no room for widening

Two vehicles {lorries, coaches} cannot pass each other without mounting pavements

My suggestion as per my previous letter is: >>>>>>>>>>>>>>>>>>>

Create another NEW TOWN  !!!!!!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/755  Respondent: 10938241 / Alan Brockbank  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 development of 2,000 houses at Wisley Airfield. The A3 is regularly grid-locked and this proposal will greatly add to congestion 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: PSLPS16/7276  Respondent: 10939617 / Trevor Jones  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The retention in the Plan of the inappropriate Wisley Airfield development seems paradoxical, given the outcome so far of the planning process, with the apparent impasse and likely inability of the developer to deliver a viable proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6657  Respondent: 10941057 / Tim Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3733  Respondent: 10941153 / Michael Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A35 Land at former Wisley Airfield  Guildford Borough Council has already refused this development of over 2000 houses, so why is it in the Local Plan? The local roads will be unable to cope with an additional 4000 cars and there is no access directly on to the southbound A3 without going through Ripley village.

We believe that Surrey County Council has earmarked this site for a recycling facility and feel that a better use would be to have an Electricity Generating Plant burning waste materials which would be a benefit to the local area (the traffic movements would not be as great as the proposed small town). The runways could be used to site Solar Panels to produce electricity as well, these could be screened by planting trees (environmentally friendly) on the Ockham side. The farmer who cultivates the land could be encouraged to produce a crop which could be used for the production of Bio Diesel. This would make Guildford look like a "forward thinking" Council taking care of of the environment and doing its bit for climate change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1342  Respondent: 10942081 / G J Teague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
9. Proposed development of former Wisley Airfield (A)

I object to this proposal.

The potential development of some 2,000 new dwellings in the middle of the Green Belt is completely unacceptable. No evidence has been offered of any special circumstances justifying development in the Green Belt, and thus the proposal does not comply with the NPPF (para 83.)

The character and amenity of the the Horsleys (2.2 miles away as the crow flies), would be irreparably damaged by the resulting enormous pressures of some 5,000 extra residents on local transport infrastructure and on educational and medical facilities. No credible assessment appears to have been made of these impacts on the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

   - I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   - I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   - 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.
   - I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/6789  **Respondent:** 10945057 / Margaret Field  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( )  **is Sound?** ( )  **is Legally Compliant?** ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
  7. Our Queen’s speech at the opening of Parliament one month ago our queen said “a promise to ensure transport and buses will not be reduced and this would be for the Mayor to ensure” - proposed local bus services have been proposed locally and now we hear the same for many train services.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will
exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I object to all the proposals mentioned above and we feel because of the result of the recent Referendum result it is imperative for the Guildford Borough Council to go “back to the drawing board” to reassess the numbers of properties which would be needed within Surrey together with providing information on infrastructure and additional facilities required. These numbers of properties required will certainly be extremely different to the calculations made before the Referendum!

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7410  Respondent: 10945057 / Margaret Field  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreenBelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2545  Respondent: 10945537 / Neill Ebers  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We are of the understanding that revisions have been made to the local plans for further housing in East & West Horsley ('The Horsleys') as well as to the housing development of the land at Wisley Airfield. We understand that amended permission has now been requested for a new settlement of up to 2,068 dwellings incorporating up to 60 sheltered accommodation units and associated infrastructure including accesses onto the A3 (Ockham Interchange). Ockham Lane and Old Lane and revised access to Elm Corner, a primary/secondary school, community provisions, nursery provision, health facility, a local centre, employment area, 8 traveller pitches, sports and recreational facilities amongst a host of other things.

Considerable congestion is already being experienced on the A3 between Guildford and the M25 (J10) junction turn off at Wisley. The congestion starts from 6.30am until around 9am and then starts again from 4.30pm until around 7pm with the tail back on some days going back a couple of miles. The A3 and the surrounding area are already experiencing difficulties in handling the existing traffic volumes which will only increase with the proposed new housing.

Outside of the traffic congestions mentioned above we are of the belief that these amended plans will be felt in surrounding areas such as The Horsleys and Ripley and will generate the following impacts:
1. Further road blockage around the surrounding areas of The Horsleys and Ripley
2. Will increase the strain on the local schools in the area.
3. Reduced packing spaces (which has already become a problem).
4. Additional pollution to the area.
5. An impact to the Green Belt status of the area.
6. More accidents in the area.
7. A further drain on the NHS resources in the area ('which are already stretched).
8. The potential devaluation of house prices.

Should our understanding be correct of what we believe are the amended plans we hereby wish to make our objections known with respect to these amended plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6869  Respondent: 10948225 / Roy Buosi  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/6058  **Respondent:** 10950273 / Stuart McDonald  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**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. This would impact also on the flooding issues that this area suffers from.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The statement that the development will result in a cycling and walking rather than the use of cars. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. These roads flood when it rains heavily.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the A3 and M25 particularly around Wisley and Painshill junctions.
  6. The lack of suitable public transport.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site.

- **I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels.**

- 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. My family and I enjoy living in Ockham because of the access to the countryside and clean air and the peace and quiet afforded by wide open spaces. I wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of the former Wisley Airfield, - now known as Three Farm Meadows because the planning application has already been unanimously rejected by GBC’s Planning Committee.

- **I object because there is already a shortage of schools in this and surrounding areas due to lack of planning by the Council and this situation will only worsen as a result of these plans. Our children are the future and we should be doing all we can to ensure they all receive the very best education. The schools planned would not be sufficient.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• 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. This would impact also on the flooding issues that this area suffers from.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The statement that the development will result in a cycling and walking rather than the use of cars. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. These roads flood when it rains heavily.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the A3 and M25 particularly around Wisley and Painshill junctions.
  6. The lack of suitable public transport.

• ◦ I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site.
  ◦ I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels.
  ◦ 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. My family and I enjoy living in Ockham because of the access to the countryside and clean air and the peace and quiet afforded by wide open spaces. I wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
  ◦ I object to the continued inclusion of the former Wisley Airfield, - now known as Three Farm Meadows because the planning application has already been unanimously rejected by GBC’s Planning Committee.
  ◦ I object because there is already a shortage of schools in this and surrounding areas due to lack of planning by the Council and this situation will only worsen as a result of these plans. Our children are the future and we should be doing all we can to ensure they all receive the very best education. The schools planned would not be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As previously set out, I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site because of the constraints on the site and the physical location.
2. Too far from railway stations.
3. Limited footpaths and safe walking or cycling routes.
4. Located next to and close to very congested motorway M25 and A road A3 which are frequently at grid lock throughout the day.
5. Local roads and back roads are not safe alternatives to blocked motorways and are very busy normally which has lead to consistent accidents due to dangerous black spots (Black Swan junction).
6. Train services already to congested and limited parking.
7. Local roads not safe for bus services, cars, cycles and walking commuters. Unrealistic.
8. RHS Wisley is near to this site and during shows causes increased traffic congestion and incidents.
9. Limited employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. I object to the negative impact to heritage sites.
11. I object to the fact that the increased area, will increase the negative impact of the views from the AONB.
12. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
13. I object to the removal of additional 3.1 ha from the green belt without any justification
14. I object to the change in green belt boundary.
15. I object to the fact that the council has failed to remove this site from the local plan.
16. I object to this development because it will not improve the dangerously high pollution levels in this area.
17. I object because the plans includes a new road for the Elm Corner residents which involves having to navigate our way through the new development particularly when there is a better alternative for the residents available to the Council.
18. I object to the proposed Submission Local Plan.
19. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
20. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
21. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
22. I object to the extension of the plan period by 1 year as it has not been identified as a major change
23. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
24. I object to the Council wasting tax payers and residents’ time and money by not following due process and ignoring previous representations.
25. I object to the 10% buffer in the housing number over the plan period.
26. I object to the evidence base which is not transparent and has been challenged.
27. I object to the transport evidence base including the Highways assessment report.
28. I object to the transport assessment which used prescribed vehicle movements from this site with no justification.
29. I object to the housing number, particularly as the Council have not, as required used any constraints such as green belt, infrastructure, air quality. I believe that the housing number is unsound and unnecessary as housing shortage is not in Surrey but in inner London where low paid workers need to live to be near to their work.
30. I object to the apparent disregard the damage caused by nitrogen deposition and high pollution levels.
31. I object to policy S2 because the figures in the AHT table do not add up.
32. I object to the quantity of space allocated for retail in the town centre.
33. I object because the schooling offered is inadequate for this area both pre-school, primary, Junior and High school. Not enough thought has been given to the future need.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. The fact that many roads are proposed to be made one directional in terms of traffic flow, provides strong evidence that the infrastructure is inappropriate for the proposed traffic volumes.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

- 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.
• I strongly object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2667  **Respondent:** 10950689 / Maureen Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an intergenerational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

When we moved to Woodfields, School Lane, Ockham, 31 years ago, there was talk about developing the airfield; a neighbour who moved here 40 years ago told me that proposals to develop the site were being discussed even then. At the last Council meeting my husband attended the most recent proposals were rejected by the Councillors UNANIMOUSLY! But were still left in the Local Plan. So what is it that you don't get? For the following reasons that you and we are sick to death of reading and writing about the site is UNSUITABLE for development and this has been recognised by the planning authorities for 40 years that I know of!

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows, Wisley Airfield, or whatever you like to call it, in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consulters.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

3. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development such as this could result in around 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and lorry movements.
   4. The danger from this traffic will be to cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with increased visitor traffic) and a proposed 600 pupil secondary school would add further congestion at the M25/A3 junction as well as local roads. No development can proceed without Infrastructure enhancements to the A3 and M25. Highways England has stated that they have no plans to even consider improving the A3 before 2020.
   6. The lack of suitable public transport. The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic, and car parking is already at capacity.

I hope that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadow), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Development of over 2,000 house village at Ockham (former Wisley Airfield) – The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We are writing in response to the publication of the new local plan and have the following objections and comments:

1. Policy A35, (Former wisely Airfield)

We object to the overriding of the Green Belt designation of this area. There are no valid reasons to permit a new development of this scale in the middle of the Green Belt with a character totally out of keeping with the existing environment in the long established villages in the surrounding area.

The resulting congestion on existing roads has not been satisfactorily considered and if such a scheme was to be permitted a much more extensive road upgrading program must be implemented. For example, the proposed access to the A3 at the Ockham roundabout only permits access to and return from the North; i.e. London bound. The only access and return from Guildford to the South is through the village of Ripley, which suffers serious congestion at times already. The only way to overcome this problem is to create south going slip roads from the roundabout to the A3 at the expense of the developer. The proposal will otherwise destroy the village character of Ripley.

The proposals seem to be entirely aimed at creating transportation facilities for London commuters. Guildford Borough Council should be concentrating on ensuring that the communications with Guildford are considered as a priority for any inhabitants of the Borough. For example, the transportation with buses assumes that commuters will travel to Effingham, Horsley and Woking railway stations. Why would anyone other than a London commuter want to take the train from Woking? There is mentioned an improvement in the set down arrangements for buses at Effingham station. The station car park is already fully utilised and there are no set down or pick-up facilities for cars there. The road leading there (Old Lane) has a number of dangerous blind corners and trees alongside the carriage way and is much too narrow for the amount of traffic that will be generated. If this scheme is to be allowed, the developer must be obligated to provide a road upgrade to an adequate standard for the frequency of traffic to be expected and provide for bicycles and pedestrians too! It is suggested in the policy that a bus service to Horsley station will be provided. This ignores that the B2039 through Horsley in parts is too narrow to permit a bus to meet a truck, unless one of them drives up onto the pedestrian pavement. It also ignores that during school term the B2039 gets temporarily blocked by mothers delivering their children to the Glenesk School in the morning. Horsley station car park is already fully utilised and the set-down and pick-up area is already fully utilised by the existing station users, not to mention those that would be added if the 533 proposed new houses in the Horsleys get built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4207  Respondent: 10953793 / Hugh Thomas  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Wisley Airfield, which is classified as a brownfield site on a spurious technicality when everybody can see that it is not what is understood by brownfield, being included in the Local Plan as a development site for 2000 houses when Guildford Planning Committee have just refused the planning application relating to it. Either the left hand does not know what the right hand is doing or this is a devious diversion. I object for all the reasons identified by GBC Planning Committee when it rejected the application.

I OBJECT to building 2000 houses at what GBC calls Wisley but is actually at Ockham, because it would massively and detrimentally overwhelm Ockham village, East and West Horsley and the entire neighbouring area. The proposal is ill conceived, showing scant regard for the Green Belt, infrastructure requirements, transport, or pollution and lacking nearly all the evidence that is needed to show that such a development would be sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objection to Guildford Borough Council draft Local Plan and to the inclusion in the plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings

As a lifelong resident of Cobham, just over the border in the Elmbridge Council area, I would be directly adversely affected by the proposal in your new local plan to remove the Former Wisley Airfield site from the Green Belt. I wish to object strongly to this proposal on the following grounds:

• The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
• No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
• There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
• The harmful impact on transport, local roads and road safety by the suggested development has not been taken into account. The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional Wisley residents, and would experience a significant increase in stationary/idling traffic at peak times and at junctions. Even with current traffic levels, Cobham centre is often gridlocked at peak times of day, especially if there are problems on the M25 or A3.
• There is a lack of suitable public transport, which the Plan does not address. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
• The issue of air quality is not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
• The environmental and ecological value of the site and the area around it is being underplayed in the Plan. Consideration should be given to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

For these reasons, I wish to object strongly to the inclusion of the Wisley site in the new Guildford Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am completely opposed to the Wisley plan as the area is unable to support that style of development: a small housing complex with associated school, dr surgery, shop and parking, play park and nursery for perhaps 150 homes would be acceptable. The impact on local roads, transport and public services would be unacceptable.

What changes (2016) / further amendments (2017) do you suggest should be made to the document?

I write to set our my objections to the local plan which seem to me to be based on unsound analysis and which is riddled with errors.

Of particular concern are the assessment of the increase in housing in the borough over the plan period which is too high and appears based on wrong figures. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. This is not helped by policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I believe that new housing should be built near existing infrastructure, in particular railway lines, and not be placed in rural areas where reliance on an already overcrowded road network is required.

It is therefore of concern that the quantity of space allocated for retail in the town centre is so high. 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.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:
1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the A3 and M25 is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking (even though there are no pavements on the local roads) are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
2. I object to the fact that the whole area sits on a hill and the proposed development including high rise buildings will be clearly visible from the Surrey Hills AONB thereby directly going against the “openness” concept of the Green Belt.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp172/5202  Respondent: 10956833 / Aiden Clegg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to set out my objections to the local plan which seem to me to be based on unsound analysis and which is riddled with errors.

Of particular concern are the assessment of the increase in housing in the borough over the plan period which is too high and appears based on wrong figures. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. This is not helped by policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I believe that new housing should be built near existing infrastructure, in particular railway lines, and not be placed in rural areas where reliance on an already overcrowded road network is required.

It is therefore of concern that the quantity of space allocated for retail in the town centre is so high. 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.
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the A3 and M25 is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking (even though there are no pavements on the local roads) are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
2. I object to the fact that the whole area sits on a hill and the proposed development including high rise buildings will be clearly visible from the Surrey Hills AONB thereby directly going against the "openness" concept of the Green Belt.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5411  Respondent: 10956833 / Aiden Clegg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking (even though there are no pavements on the local roads) are being promoted at the same time. This is totally unrealistic and unsafe.

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

2. I object to the fact that the whole area sits on a hill and the proposed development including high rise buildings will be clearly visible from the Surrey Hills AONB thereby directly going against the "openness" concept of the Green Belt.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5252  Respondent: 10956865 / Annette Parkin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The local Plan 2016 appears to have conveniently overlooked the objections raised by the rejection of Application No 15/P/00012 by your own planning committee on 8th April 2016 on the advice of Planning Officers. I urge you not only to think outside the box but outside your borough to the impact on residents in the surrounding area. Thank you for your time and attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3763  Respondent: 10957313 / R Holmes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy A35 Land at former Wisley Airfield, Ockham

Proposed allocation: development of a new settlement

including approx 2000 dwellings, 100 sheltered accommodation units, 8 traveller pitches, approx 4,300 sq m of employment space, approx 1,100 sq m of retail space, a local centre, primary school and secondary school.

response: objection

Objection response: Policy A35: Land at former wisley Airfield, Ockham

Proposed location: development of a new settlement

(including approx 2000 dwellings, 100 sheltered accommodation units, 8 traveller pitches, approx 4,300 sq m of employment space, approx 1,100 sq m of retail space, a local centre, primary school and secondary school)

-Proposed site is green belt. All green belt land must be protected. Guildford Borough council must vigorously defend all green belt land. The national planning policy framework 2012 (section 9.79) states that: 'The Government attaches great importance to Green Belts. the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of green Belts are their openness and their permanence'.

-Developed near site of special scientific interest (SSSI) and the thames basin heaths special protection area (spa).

-Potential for increased crime and nuisance (nearest police stations were Ripley and Cobham but both are now closed).

-More light pollution.

-More air and noise pollution.

-Adverse visual impact. No amount of 'landscaping' will remove the impact that 2000 houses, shops, schools, retail outlets, offices, additional cars, lorries and vans will have on the surrounding area.

-More litter on our roadsides. Parts of the A3 and many of our local roads are lined with litter which is very unsightly and whichever 'body' is responsible for clearing litter do not seem able to do so or have a solution to the problem. Imagine what extra litter a whole new settlement could bring.

-Drainage Inadequacies. Although the site itself will have new drainage systems on site, presumably there will need to be connected at some point onto existing local systems.Ditches on local lanes are very rarely cleared these days which can contribute to road flooding as the rain cannot always disperse into the ditches and the existing drain system cannot cope. The new drainage required for this site will just add to this problem.

Objection response.

Policy A35: Land at Former Wisley Airfield, Ockham

Proposed allocation: development of a new settlement

-Pedestrian and cycle network not adequate. Many local roads/Lanes around the site do not have pavements. Many of them are very narrow and dangerous for cyclists. They are not suitable for any increase in traffic, especially vans and Lorries visiting the settlement and new cars which appear to be increasing in width. If the council really want to try and encourage more people to cycle, it will not be by painting 'dotted lines' on the road. Cycle lanes in and around rural areas and villages need to be separated somehow form the roads (possibly by using curb edging to divide the cycle lane from the road) but unfortunately many of the Lanes around the site are not wide enough to do this. However, creating specific cycle lanes away from roads may not be a good idea as they could, even with lighting, become isolated areas and therefore not a safe environment.
- Rail commuters may prefer to drive (or be driven) to a railway station causing more congestion. Car parks at nearest station(s) may not be large enough to cope with the increase and are chargeable, increasing the cost of the commute.

- Bus services. Policy A35 states that a significant bus network will be set up to be provided and secured in perpetuity. It would need to be a significant frequent bus network covering, peak times, say, 07:00-10:00 HRS and 16:00-19:30 HRS. It must also have a timetable up to approx 23:45 HRS, linking with train arrivals at the various railway stations, including Woking and Guildford, to cover those returning at various times from a city night out. Is the developer, who is funding the delivery of this network, also going to fund the ongoing running costs of this significant (and hopefully frequent) bus network in the many years after completion - if not then who is?

- Access Roads to/from the site

A3 Ockham interchange. This roundabout is already very busy at peak times. Queues onto the A3 Northbound at this junction are normal, especially as the inside lane of the A3 at this point is usually queued down to junction 10 of the M25. On many occasions the middle lane is also queued. If anyone using this roundabout wanted to go south onto the A3, they would need to go through Ripley and Burnt Common which is already crowded at peak times. The slip road from the A3 (towards Horsley, Ripley, Send, Woking areas) is already very busy and the junction and adjoining roadscannot cope with more vehicles. For all the above reasons, having additional traffic at this interchange is not viable.

Old Lane. Drivers wishing to head south on the A3 from this lane would turn left onto the slip road connecting J10 of the M25 to the Southbound A3. This slip road is currently extremely busy with cars in the process of speeding up to join the fast movement of cars already on the A3. To potentially have a great number of new cars trying to get onto the slip road at his point would not be a good idea.

- Proposed mitigation measures in Ripley: If Ripley high street and Newark lane need improvements and there is a suitable way of improving the already congested crossroad in Ripley, then those changes should be done anyway. I appreciate approving this development is a way of getting someone else to pay for the work but this is too high a price!

- Surrounding Road Network: Traffic along the A3 is at a standstill most weekdays between Burpham and the A31 Hogsback Junction.

- The A246 is already a busy road during peak hours and any increase in traffic, either towards Leatherhead or Merrow and Guildford, would just make it worse.

- There are queues at peak times on the A247 at the Old Woking roundabout, the Burnt Common Roundabout, the B2215 through Ripley and Painshill roundabout junction.

- Further afield at peak times there are queues at the A3 Copsem lane junction and Copsem lane itself towards Oxshott and towards Esher. Queues through Esher from both Cobham and Kingston directions. The A245 from Brooklands to West Byfleet. The A245 Byfleet road to the Painshill Junction with the A3. The A318 from Brooklands. The A31 Hogsback junction onto the A331. The A31 Fanham by-pass. The A24 Leatherhead Road towards the Leatherhead by-pass roundabout. These are just some of the problem roads in the surrounding area.

- If major incidents occur in this area on the M25 or A3, the Local Roads become even more congested than normal.

- Conclusion- Green Belt Land/Access/ Surrounding road Network.

All Green Belt Land must be protected.

Taking into account all the points raised, it is quite clear that the access links for this site are not viable and the surrounding road infrastructure is nowhere near ready for this development.

- All these road network issues need to be addressed, filed and dealt with before and further development, especially one of this size, is even considered otherwise no one will want to come to Guildford or its surrounding villages and no company will want an office or unit in the area where their employees, visitors or delivery Lorries/vans have to sit and waste time and money on grid locked roads in order to get there.
**Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4999  Respondent: 10957857 / Adam Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Three Farms Meadow site

I strenuously object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear indication to the developers to try again, with minor adjustments. This is unacceptable.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. I am concerned that there is no transparency as to the identity of the developers who are hiding behind a Cayman Islands company. This type of anonymity has recently been discredited by the government, but it does not seem to bother GBC.
Policy A35 should be removed from the plan for all the reasons by which the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3282  Respondent: 10958177 / Brian Cooke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield from the Green Belt

I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee

I trust that these objections will be fully considered and that the Former Wisley Airfield,(Three Farms Meadows), Allocation A35 is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I oppose the Draft Local Plan produced by G B C to include the following points of objection

INCLUSION OF GREEN BELT SITES AS STRATEGIC SITES and removal of Green Belt areas from the Green Belt

Wisley Airfield, Three Farms Meadows Ockham is Green Belt and not appropriate as a sustainable development and should not be a strategic site when G B C Planning Committee last month turned down the application for a new town on 14 grounds, unanimously

It is clear the experienced planning Councillors considered this a non starter as do developers in the area, they would not touch the site in any event

It is unsustainable

Air quality is poor at the interchange of M25 and A 3, at Junction 10

Wisley R H S is expecting half a million new visitors a year, imagine this extra congestion and poor air quality if in addition TFM has a further 2000 dwellings right opposite RHS Wisley on the other side of the A3

Please refer to the 14 objections your Councillors unanimously upheld, drafted by your G B C Planning Department. All upheld. All meaning that this is the wrong development in the wrong place

Please remove it from the Draft Local PLan as a strategic site now

This is squeezing a new town between tiny villages of a few hundred houses and people living there

It will ruin the farmland; It will ruin Ockham; It will ruin Ripley; It will ruin East and West Horsley; It will ruin Send; The A3 will not cope; Health will deteriorate; There are no jobs; The roads are country lanes; The area cannot cope with these numbers; We are a tiny rural hamlet of a few hundred people with agriculture as the main use of the land; There is no infrastructure for a new town; It is a medieval hamlet with an ancient Church All Saint’s Ockham and Grade 11 listed buildings; It is Green Belt Surrounded by conservation areas; Rare flora and fauna exist; Great crested newts, Dartford Warblers, Nightlarks, Red Kites, fungi and butterflies and snakes all rare and protected; This Plan destroys our countryside and fails to prevent town congestion.It would destroy the qualities that make Guildford and its surrounds a successful place to live and work. This plan provides too much land for development and does not do enough to ease congestion. The Green Belt needs protecting as do the Surrey Hills; Why are brown field sites not being used for development? To clear the area of derelict unsightly land and utilise it for the needs of Guildford residents; Residents will not be provided with homes they required; The proposed developers are overseas, Cayman Island Registered company. Surely this is of enormous concern to G B C, and I trust all investigations into ownership in accordance with the law have been carried out by G B C. The character of Guildford will not be protected and improved upon. This is required in a draft Local Plan as follows, concerning Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. REMOVAL OF former WISLEY AIRFIELD FROM THE GREEN BELT

This is farm land. Please visit. It is lush with maize. Cattle graze. People walk and cyclists and horse riders use rights of way I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

1. INCLUSION OF FORMER WISLEY AIRFIELD

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

It is well known that the site is unsuitable for a so called new town – this is a farm, this feeds many people, it is used every day by locals and visitors as recreational space and its beauty in the summer months will be lost for ever. Its views to the Surrey Hills will be impeded. Life in Ockham and surrounding villages will not cope with 5000 extra cars on the road, 4000 extra people in a hamlet of under 400 people and under 200 homes.

PLEASE REMOVE FORMER WISLEY AIRFIELD AS A STRATEGIC SITE NOW

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

THIS SITE NEEDS PROTECTION< NEEDS TO BE IN THE GREEN BELT< NEEDS TO BE SURROUNDED WITH CONSERVATION AREAS with Dartford Warblers, Great Crested Newts, Skylars, Red Kites, rare fungi, butterflies and bees

Please BUILD ON DERELICT UNSIGHTLY BROWN LAND and kindly leave nature to flourish in Ockham

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please do not change the status of Green Belt Sites in Guildford Borough

I object on this basis to the draft Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6218  **Respondent:** 10959425 / Jan Lofthouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt land in Ockham is included as a strategic site in the G B C draft Local Plan

Its habitat includes Skylarks

Dartford Warblers

Great Crested Newts

Red Kites

Rare plants

Rare butterflies

Snakes

Badgers

Other protected species

Why do Surrey Wildlife Trust maintain the conservation areas, SNCI, SPA Thames Basin conservation areas around Ockham?

Surely this is to preserve the wild life and the green environment

Please visit now the Ockham Common, the Former Wisley Airfield, now Three Farm Meadows

It will look very different to six months ago, green and lush and full of crops and trees rare flowers and wildlife

How can you build on this?

Why are rangers protecting the sites?

We are all protecting the sites in Ockham

and surrounding villages in the green belt
And so

Why is G B C not?

I await your comments

Please remove Former Wisley Airfield (temporary in the war and promised by Government to be returned to agriculture) now Three Farm Meadows from the draft Local Plan as a strategic site and I object also to your draft Local Plan generally as it fails to preserve our green belt land

that is apart from where prominent councillors happen live, such as Ash!!! I wonder why

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7278  Respondent: 10959425 / Jan Lofthouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please remove Former Wisley Airfield (temporary in the war and promised by Government to be returned to agriculture) now Three Farm Meadows from the draft Local Plan as a strategic site and I object also to your draft Local Plan generally as it fails to preserve our green belt land

that is apart from where prominent councillors happen live, such as Ash!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7644  Respondent: 10959425 / Jan Lofthouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have seen all the documents supplied by Wisley Action Group concerning objecting to the Draft Local Plan
I fully support all WAG says in Parts 1 and 2 and therefore I strongly object to the draft Local Plan just as WAG has done

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4301  Respondent: 10959425 / Jan Lofthouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
I object to the continued inclusion of Three Farm Meadows, the Former Wisley Airfield as a strategic site in this Plan.

I agree absolutely with the views of Ockham Parish Council above.

I trust that the green belt, agricultural site will be removed from the Plan.

The OPC response is attached for ease of reference and I fully concur with the objections.

The Wisley site is totally unsustainable and there are no reasons for an unwanted unsuitable development there with conservation areas, Special Protection Areas, Sites of Special Scientific Interest, wildlife to include rare Dartford Warblers, nightingales, night jars, great crested newts, rare butterflies,

The immediately surrounding rural villages would be ruined, that is Ockham, Ripley, Send, East and West Horsley and all neighbouring areas would be at gridlock to include Cobham, Wisley, Esher.

The Guildford area has plenty of disused brown field derelict areas for housing.

The housing numbers are wrong in any event.

Guildford Borough Council rejected planning permission on Three Farm Meadows Ockham – The former Wisley airfield which is a farm, on 14 planning grounds last April 2016, and so query why they continue to include this as a strategic site, in contradiction to its decision.

The people of Ockham continue with the fight to stop planning development on this site with the appeal this September 2017 by overseas Cayman Islands anonymous so called developers, having had to raise almost £200,000 from a tiny village of under 200 homes and approx 400 residents and query for how long this will continue that there enjoyment of daily life is interrupted with the so called developers constantly reapplying for permission on this land, and moving the goal posts.

The site needs to be recognised as it is, a green belt agricultural piece of land, being the lungs of London, enjoyed by all who work, live, walk, and spend recreation time on foot, with bicycles, horses, families.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

- OPC_Response_to_Updated_Local_Plan.docx (42 KB)
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
8. I object in the change of green belt boundary to the east – this now includes an area of high archaeological impact.

9. I object to the inclusion of A35 due to the constraints in the provision of sewerage capacity.

10. I object to the disregard of increases air pollution and nitrogen deposition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5826  Respondent: 10964161 / Lionel Fewson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to strongly object to the above proposed development as it breaches rules, will have major adverse impacts on the natural environment including wildlife, local traffic and infrastructure as well as resulting in a development which is total out of character with surrounding settlements and lacking in the fundamental tenets of sustainability. The housing density of the proposed new development would be roughly 6 times as dense as the existing local settlements.

The site falls within the Metropolitan Green Belt and, as such, should only be developed if the proposal meets “very special circumstances”. The proposal singularly fails to demonstrate that the benefits of the development outweigh the harm to the Green Belt and other aspects noted above. The development would create the largest settlement in Guildford Borough after Guildford itself, and be the inevitable precursor to further development of the Green Belt and spread of suburban London outside of the M25.

The local roads in the Horsleys area are basically narrow, winding country lanes, already busy at peak times and will not be able to cope with the additional high volumes of traffic the development would create. The lack of suitable infrastructure in the proposed development will make the car the first choice of transport – probably another 4000+ cars and associated journeys - adding to the already serious traffic queues experienced around the M25/M3 junction, of existing concern already to Highways England. The local rail stations at Effingham Junction and East Horsley do not have sufficient parking to accommodate the extra cars and cars are already now parking on Effingham Common Road as the station car park is regularly full.

Both Ockham & Wisley Commons lie within an area designated as a Site of Special Scientific Importance (‘SSSI’) and forms one part of the Thames Basin Heaths Special Protection Area. A large percentage of the site lies within the 400m Exclusion Zone where new building is effectively prohibited. The impact of such a large settlement and associated pets will inevitably have a detrimental impact on the local wildlife.

GBC Local Plan

Noting that the proposed Wisley Airfield development constitutes a fundamental part, I wish to object to the overall proposed Submission Local Plan.

Many of the comments above, particularly those relating to moving the boundaries of the Green Belt, the significant impact of increased traffic on already busy narrow local roads, lack of sustainability and inadequate proposed improvements to local infrastructure apply more generally to the development proposals contained in the document. The proposed developments are out of character with the village nature of the Horsleys and, particularly, the density of the new housing will contrast starkly with the existing settlements.
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>PSLPS16/1853</th>
<th>Respondent:</th>
<th>10965633 / Charlotte Taylor-P</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings
I am writing to object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

  1. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

  1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

  2. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

2. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, 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 Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

  - I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6690  **Respondent:** 10965953 / Mark Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

we object to the development of over 2,000 houses at Ockham. Aside from the obvious impact on the Horsley train station and roads the air quality at this busy M25/A3 junction must be assessed prior to any possible plans being implemented or adopted.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/4166  **Respondent:** 10967041 / Ashley Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
The Large Housing Development Sites:

There were over 30,000 complaints and comments and objections to the last local plan sent out for comment yet GBC have hardly changed any of this latest plan to reflect these, even when the 2000 houses ridiculously tabled for Wisley airfield was rejected by councillors; yet this is still in the plan!

I object to the inclusion again of the proposal for 2,000 houses and other development in Green Belt at the former Wisley Airfield

This is just about DOUBLING the size of the horsley’s with absolutely no new infrastructure. The current roads FLOOD regularly, the roads are terrible to drive on, the drainage cannot cope, there is no real transport links, schools, doctor’s surgeries are full. All of this against a plan which proposes taking the villages out of the green belt for no other reason than concret ing them over. Planning regulations do not allow for this except in EXCEPTIONAL circumstances and taking the villages out of the greenbelt to build on them is not a valid reason.

I OBJECT to the number of cars that would obliterate the local roads, using an average of 2 cars per house this is nearly 6,000 extra cars in a village with extremely poor roads, drainage, infrastructure. The plan makes no provision for improvements.

I OBJECT to the plan on the grounds of the level of pollution introduced by these extra cars, houses etc.

I OBJECT to the plan on the grounds of the infrastructure will increase flooding where we already have flooding every year.

I OBJECT to the plan on the grounds that there is no provision for extra school places within the Horsleys in the plan despite swamping us with extra houses.

I OBJECT to the plan on the grounds of the lack of facilities proposed such as doctor’s surgeries, public transport.

I OBJECT to the plan on the grounds of transport - no real increase in public transport and the train into London each morning is now already almost full with standing room only from a few stations from Horsley.

I OBJECT to the plan’s use of the projection for the number of new homes required per year. The figure is based on invalid statistics and almost twice the ONS projection so must be revised down. For example the ONS figure already uses economic growth in it’s figures and affordable housing is over estimated based on GBC’s own existing policies.

GBC has decided to pursue AGGRESSIVE EXPANSION and Forced Growth and the residents DO NOT SUPPORT THIS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Development of over 2,000 house village at Ockham (former Wisley Airfield) - The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller & schools development, under 2 miles away, would be enormous. The plan also includes extensive developments at Burnt Common (400 houses & commercial developments) & Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5969  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT for the following key reasons:

- The plan which proposes over 70% of new housing be built within the Green Belt. There are brownfield sites within the urban areas which can easily be regenerated, without encroaching on Green Belt land which is currently protected

- Regarding the removal of the former Wisley Airfield from the Green Belt – this site is part of the ‘lungs’ between north Surrey and London introduced following the second world war, in order to ensure public health safety to the people of London as well as those living in north Surrey. Permitting this development will serve to create an urban corridor stretching from London to Guildford, when no exceptional circumstances have been established that warrant removal of the land from the Metropolitan Green Belt.

- Including 693 houses per year (double original estimates) represents a significant deviation from earlier versions of the plan without any clear rationale other than seeking to turn Ripley, Ockham, Send and E & W Horsley into an extended London suburb. Where is the transparency?

- When taken alongside other proposals for this area, this plan contributes to over 23% of new housing - across the borough – when currently local infrastructure creaks with only 0.3% of the total population of GBC. This feels like punishment to residents for no apparent crime, other than choosing to live in rural environment.

- This plan will place unimaginable stress on transport, local roads and road safety. In particular I object to:
  1. The belief that more people will walk or use bicycles. The roads are already unsafe, lack street lighting, in part isolated, and so local residents are forced to rely on cars as reliable bus routes, and railway stations are too remote to make either option realistic. I challenge the Planning Committee to visit the area on bicycles, rather than the minibus used for your site visit prior to the April Planning meeting (which you will recall resulted in lots of time wasted due to the normal congestion on our roads – as a result of local traffic, HGVs seeking to avoid congestion on the A3 and M25 and the usual farm traffic – a requirement of rural life).
  2. In view of the above, local residents already are forced to rely on private cars in order to live from day to day.
3. Local roads are already becoming wider as a result of encroachment by HGVs and large vehicles onto roadside banks and hedges, resulting in pot hole damage. British weather causes flooding due to the low lying area and the proximity of the water table – are their plans to address this? Pot holes go for many months unaddressed, and are then filled often during rainy weather, resulting in subsequent damage when the temperature falls – year on year.

4. Your own investigation confirmed that an increase of 2068 homes would result in an estimated 4,000 additional cars on the roads.

5. The danger such increases will cause is directly to the very people you are identifying will take to the roads in great numbers – walkers and cyclists.

6. Again, your own investigation prior to rejecting the access plans to the Wisley Airfield site identified major problems due to anticipated additional vehicles leaving and joining both the A3 and M25 and the Ockham/Wisley interchanges. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. The plan for expansion at Wisley alone will increase visitor traffic.

7. To put together all the proposals – RHS Wisley, the proposed Wisley Airfield development and Garlick’s Arch with massive implications for traffic in the surrounding area, the wider implications in the Plan are nothing short of negligent – Junction 10 and the A3 southbound are already gridlocked for some 3-4 hours on many days each week. Perhaps a heliport should be included – the hardstanding after all is already on the Wisley Airfield site?

8. Whilst the proposal to provide additional local public transport services sounds good on paper, buses cannot move faster than other traffic which currently blocks the roads. Parking at Woking, Effingham and Horsley stations is usually at capacity and will be unable to cope with the increased passenger traffic.

- This plan includes (to reduce necessary footprint) urban-style buildings up to five storeys high and a population density higher than most London boroughs – this is out of keeping and will be a blight on the local countryside.
- Insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area, Sites of Special Scientific Interest and Site of Nature Conservation Interest.
- Air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. The Plan will cause irreversible impact in habitat for wildlife.
- You have had repeated evidence that many of the proposals in the Plan are contrary to the wishes of local communities. These proposals will inevitably receive opposition – and notably, are generally proposed to take place in areas where Councillors DO NOT live.

In conclusion, I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of intensive investigation and consideration the Planning Application submitted by Wisley Property Investments Ltd was unanimously rejected by the Planning Committee (which I was present at) on 8th April 2016 on the recommendation of GBC Planning Officers, who presented all of my concerns and more.

These serious concerns also been presented by authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2017) and my letter focusses on the developments on the former Wisley Airfield site – and the impact this will have on the immediate local area including Ripley and Ockham. I was present at a Planning Meeting earlier in the year when the Planning Committee unanimously accepted a review by one of their own officers, of the development proposals because of the complete lack of appreciation of the impact on local roads, and travel, and resulting impact on the village of Ripley, and RHS Wisley.

I note policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

My objections are as follows:

1. This is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees. The implication is that “consultation” is simply a tick box exercise.
3. I object to the quantity of space allocated for retail use 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.
4. I object because there is a complete denial of the cumulative impact on each of the proposed housing settlements including that on the Wisley Airfield site, on existing local villages and residents.
5. I object because it is adjacent to the most popular visitor attraction in the south-east, the RHS gardens at Wisley where visitor numbers are expected to increase by 500,000/annum.
6. I object because the associated traffic increase from the RHS has not been taken into account.
7. I object because the regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. I object because the identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station and its impact on Wisley Village, Pyrford and West Byfleet.
9. I object to the increased area of the Wisley site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
10. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills Area of Outstanding Natural Beauty (AONB) will increase the negative impact of the views from the AONB.
11. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
12. I object to the removal of additional 3.1 hectares from the Green Belt without any justification.
13. I object because it is further from railway stations than any other identified strategic site and this is mitigated by the assumption that an improved local bus service will be provided ‘in perpetuity’.
14. I object because it is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the county (J10).
15. I object because local roads are at capacity particularly when the Strategic Road Network (SRN) M25 Junction 19, and A3) are rarely free-flowing (accidents, diversions, roadworks etc).
16. I object because any public transport provision such as bus services to and from Guildford to Ripley (currently running a minimal service) will have to extend their route and negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
17. I object because any public transport (bus services) provision to West Horsley (necessary if Effingham Junction railway station is considered as suitable to alleviate the burden on local road networks) will impact the safety of the local road network as the current lanes (many with listed buildings as homes, and farmland along them) are not wide enough to accommodate PSVs. Also, sustainable methods of travel such as cycling and walking which are being promoted at the same time, are known to be unrealistic and unsafe. Have our local councillors already forgotten their journey in a mini bus when viewing the site earlier this year?
18. I object because there is insufficient employment available on the Wisley site so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
19. I object because the lack of provision for retail, health and education infrastructure is predicated on the numbers of properties occupied – this is unrealistic and can too easily be renegotiated if housing remains unsold.

20. I object because the changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.

21. I object because opportunity (3) should be common to all sites and is not unique to this site.

22. I object to the change in Green Belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

23. I object to para 21 which “limits” development in flood zone 2 and 3. Development MUST be excluded in flood zone 2 and 3 – many local residents will testify to the impact this already has on local homes.

24. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

25. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

26. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

27. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

28. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

29. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

30. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

31. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

32. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

33. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

34. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

35. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

36. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

37. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6804  Respondent: 10967521 / Jayne Way  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farm Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the disproportionate allocation of housing in this specific part of the borough. Indeed over 23% of the Plan's new housing is proposed in the immediate localities my home in Ockham, together with Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that currently only has 0.3% of the population of GBC).

4) I object to the massive 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 dwellings (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2000+ dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

5) I object to the very seriously detrimental impact on the local infrastructure which in my view will be massively overwhelmed by the Plan. Roads, stations, schools to name but a few are completely inadequate to cope with the projected increase in demand.

6) I object to the fact that the proposed Plan does not meet the stated needs and desires of local communities, as evidenced in the Ockham Parish Plan. We local residents enjoy living in Ockham because of access to countryside and clean air as well as peace and quiet afforded by wide open spaces. Over 90% of residents want both the historic features of the village maintained and our village's green spaces, including the FWA/TFM, protected.

7) I object to the continued inclusion of a site (the former Wisley Airfield - now known as Three Farm Meadows) - where the planning application has been unanimously rejected by GBC’s Planning Committee.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity?

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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. 10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

3) I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons: 1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. 2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

2 a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity 7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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. 10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2579  Respondent: 10967841 / Ian Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   o The associated traffic increase from the RHS has not been taken into account.
   o The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
2. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
3. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
4. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
5. Opportunity (3) should be common to all sites and is not unique to this site
6. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
7. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
8. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
9. I object to the removal of additional 3.1 ha from the green belt without any justification
10. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
11. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

12. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

14. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

15. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/8297</th>
<th>Respondent:</th>
<th>10968993 / Alastair Cameron</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></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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<td>is Sound?</td>
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<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
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</tr>
</tbody>
</table>
Dear Sirs,

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the inclusion in the plan of:

1. a) The Former Wisley Airfield, now known as Three Farms Meadows – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings, and

1. b) The Paddocks, Rose Lane, Ripley – Allocation A57 – the site is allocated for 4 Traveller pitches

I object to the draft Local Plan for the following key reasons:

• I object to this version of the local plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas, which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the Former Wisley Airfield, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural villages of Ripley, Ockham and the blight on properties there. The plan calls for Ockham, 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where GBC’s Planning Committee has already unanimously rejected the planning application.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I also specifically object to the proposal that 4 traveller pitches be formally established at The Paddocks, Rose Lane, Ripley:
  1. The current occupant has temporary consent until 2018, granted by the appeal inspector in 2015; in conclusion, the inspector wrote

"45. Overall, therefore, I conclude that temporary planning permission should be granted for a temporary period of 3 years. This allows sufficient time for alternative sites to become available and provides accommodation for the appellant and her family in the intervening period."

This summary by the inspector hardly implies an expansion of the site to 4 pitches, and although the policy specifies single family occupancy, this will be impossible to control and multi-family occupancy will result, if not already in place.

1. Policy A57 states: "Bricks and mortar housing, or any buildings capable of being converted to bricks and mortar housing, are not appropriate and will be resisted on this site”. As has been reported, a brick dwelling has already been constructed.

If this policy is realized, the expansion of this sensitive green belt site is likely to continue indefinitely - on the lines of the West End Farm development which we saw in 2009, which in the end was only stopped by private legal action.

**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: PSLPS16/3151  Respondent: 10970945 / Lee Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the draughted plans for the site A35—Wisley Airfield and site A25 gosden hill farm, as this will destroy the trusted close community installed in Ripley and the surrounding areas and will cause major congestion in the area. 4000 homes is totally inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5919  Respondent: 10977441 / Nataliya Smirnov  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comments on Proposed Submission Local Plan: Strategy and Sites 2016 - Consultation

Policy A35: Site Policy – Land at former Wisley Airfield

I would like to register my strong objection to this policy.

The proposed development will result in approximately 2,100 homes.

Increase in new dwellings of such scale does not only have a serious impact on infrastructure and local amenities, but will also irreversibly change the face of nearby villages like Ockham and the Horsleys, making them akin to towns.

Our current infrastructure and roads are insufficient and are not able to cope with any additional increase in use. As an existing resident, I certainly have noticed pressures experienced by our medical centre and schools, all of which are already stretched to their limits, even under our present number of residents.

To accommodate the increase in population resulting from developing Wisley Airport into 2,100 new homes, new roads, schools, medical centres, drainage and water supplies as well as other amenities would need to be build. However, our surrounding areas are simply not able to absorb any significant additional infrastructure development without being truly destroyed. There is simply not enough physical space.

When considering the full effect of this new housing, the Local Council should take into account and assess responsibly the seriousness of the impact and significant deterioration in the quality of life that would result from this development,
not only for the local residents and the surrounding flora and fauna, but also to those who would move to their new homes in the former Wisley Airport, should this development go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2668  **Respondent:** 10986209 / Richard Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC)

- 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.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: psp172/2295  Respondent: 10986209 / Richard Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
When I moved to Woodfields, School Lane, Ockham, 31 years ago, there was talk about developing the airfield; a neighbour who moved here 40 years ago told me that proposals to develop the site were being discussed even then. At the last Council meeting I attended the most recent proposals were rejected by the Councillors UNANIMOUSLY! But were still left in the Local Plan. So what is it that you don't get? For the following reasons that you and I are sick to death of reading and writing about the site is UNSUITABLE for development and this has been recognised by the planning authorities for 40 years that I know of!

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows, Wisley Airfield, or whatever you like to call it, in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
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18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consulters.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
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31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

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 A35**

**I OBJECT** this land is agriculture land located in the Green Belt it is a Site of Nature Conservation Importance. It has according to the Surrey Botanical Society Records 228 different species of plants and grasses of which the following are scare in Surrey or are on the GB Red List:

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<th>Taxon</th>
<th>Vernacular</th>
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<td>Surrey Scarce</td>
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<td>BAP, Surrey Scarce</td>
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<tr>
<td>Eleocharis palustris</td>
<td>Common Spike-rush</td>
<td>Surrey notable</td>
</tr>
<tr>
<td>Epipactis helleborine</td>
<td>Broad-leaved Helleborine</td>
<td></td>
</tr>
<tr>
<td>Filago vulgaris</td>
<td>Common Cudweed</td>
<td>GB Red List Near Threatened</td>
</tr>
<tr>
<td>Gnaphalium sylvaticum</td>
<td>Heath Cudweed</td>
<td>GB Red List Endangered</td>
</tr>
<tr>
<td>Hypericum tetrapterum</td>
<td>Square-stalked St John's-wort</td>
<td>Surrey notable</td>
</tr>
<tr>
<td>Lamium amplexicaule</td>
<td>Henbit Dead-nettle</td>
<td>Surrey notable</td>
</tr>
<tr>
<td>Ophrys apifera</td>
<td>Bee Orchid</td>
<td></td>
</tr>
<tr>
<td>Parentucellia viscosa</td>
<td>Yellow Bartsia</td>
<td>Surrey Scarce</td>
</tr>
</tbody>
</table>
It is adjacent to Elm Corner Wood and Hunts Copse both Sites of Nature Conservation Importance and in the proximity of a Thames Basin Heaths SPA of Ockham and Wisley Commons Site of Special Scientific Interest. The development would be a disaster for the area 2000 homes would be 6000 people, 12000 feet destroying the area.

The council has already rejected the development proposal for the site for the following reason:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

But as reported in the national press the CEO of the Cayman Island Company (which have three major player from the Tory party including an former minister connected to it) who owns the land at Wisley, made a donation of £100,000 to the Tory party and then the site is back in the local plan. One can only wonder how this can happen, possible a phone call from central Office to its supports on Guildford Council? The company seem very sure they will get their approval because at the local cinema’s they are showing a short film during the adverts extolling how wonderful the development will be.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5782  Respondent: 10991873 / Trevor W. Orpwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

• The plan has been based on the intention of adding 13,860 new homes to Guildford Borough over the 2013 - 2033 period, this represents a massive increase of 25% of the housing provision in just 20 years, the need for this huge increase has not been explained or justified, as neither has the basis on which the SHMA has been calculated. It is also the case again without justification that GBC has enhanced this figure to a level which is 70% higher than the official national estimates for population growth than the Borough. The GBC has no mandate from its residents to provide this additional level of housing and therefore has completely departed from the ethos of “localism” in planning policy.

The effect of Brexit will be to reduce the demand for housing nationally and the ability of the building industry to provide it, making GBC’s figures even more extraordinary.

• I object to a plan which proposes that over 70% of the new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are for no good reason being forgotten and ignored.

• I object to the disproportionate allocation of this new housing in this particular part of the borough which means that over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt, and its inclusion in the Local Plan as a site suitable for development. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The proposed removal of this site from the Green Belt by GBC only a few months after Wisley Property Investments Ltd.‘s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers is totally hypocritical, lacking in logic and integrity, and would seem to indicate the existence of an unduly coercive influence by the associated developers on some council members.

From what I have seen of the Local Plan Guildford’s planners, councillors and external consultants seems to have forgotten (or not be aware of) what gives the Borough and Surrey as a whole its unique character and the attributes which currently make it one of the most desirable places in the country to live in.

The first of these is of course that a good proportion of the Borough and indeed the county is countryside protected by the Green Belt, a piece of planning legislation which has given London its “Lungs” and prevented an unrestricted urban sprawl envied by most of the world’s capital cities.
The second is that quintessential element of the British countryside, small villages dotted about the county each with its own character, vernacular architecture, church and village green and individual communities.

The third attribute is the space that we enjoy by choosing to live in a rural and not an urban environment.

The proposals shown in the Local Plan spell out the destruction of what causes this part of Surrey to be unique and will devalue the quality of life of many of the Borough’s residents particularly in the Horsleys, Ockham, Ripley and Send.

- For these reasons I also object to the proposed extension of the Settlement Boundaries of the Horsleys.
- I also object to the Local Plan proposals for any significant increase in the population of the Horsleys, Ockham, Ripley and Send. Notwithstanding the effect of proposed development in these villages the provision of over 2,000 homes on the Former Wisley Airfield will add some 5,000 to 6,000 people to the area and probably 3,000 or more extra vehicles. This new community will need to get to their workplaces and schools and as there is no train station proposed for Wisley Airfield they will have to travel by car either by driving to Guildford or London or to the train stations at Horsley and Cobham. This will involve them accessing the A3 where the 3,000 vehicles would first have to go south to the Ripley/Ockham junction before going east to Horsley Station or north to London and Cobham.

At the present time at rush hour there are often queues northbound between the Ripley/Ockham roundabout and the Cobham roundabout and the addition of a further 3,000 vehicles at this time would cause these roundabouts to seize up and effectively close the A3. Those motorists lucky enough to complete their journeys via the A3 will find that there will not be any spare car parking at either of the stations (where there is no room to extend either the car parking or the platforms) and even if by chance they did find a space in the car park they probably would not find one on the train.

In the villages most of the primary foul water, surface water, electricity, gas, and telephone services are 80 or more years old, close to capacity and near to the end of their effective life. My personal experience of this is that in the six years that I have lived in Ockham Road South East Horsley the electrical supply to my part of the road has failed twice, once for five days and the second time for two days due as the electricity supplier told me, to the age and capacity of the mains cables.

Although new energy saving technologies and elements like sustainable underground drainage systems can to a degree reduce the impact of any new developments ultimately they still have to be provided with services form the existing primary utilities infrastructure which will not be able to cope or be renewed by the monies obtained from the anticipated community infrastructure levies.

Other resources which will be overwhelmed will of course be the local healthcare services (where appointments are already difficult to get) and many will be aware of the near impossibility of parking at Royal Surrey County Hospital. It is also the case that most of the local “country” roads already have difficulty in withstanding the onslaught of potholes following each winter, without the added attrition of 100’s of heavy good vehicles which will be unleashed when any significant development works start.

- 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:
I object to the fact that the council has failed to remove the Three Farms Meadows this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5667  Respondent: 10992065 / Saskia Janssen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The former Wisley Airfield development

I object to the current plan of developing the Wisley Airfield with more than 2000 houses.

Creating a town, nearly the size of the Horsleys together, will immensly affect the local infrastructure. It currently provides a barrier to outward development from London which once the development is in place will merge villages and bring London much too close.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2742  Respondent: 10992417 / Philip Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to continue to register my objections to the inclusion of Policy A35, Three Farms Meadows in the Draft Local Plan.

1. Congestion – road traffic. I object on the grounds that this development has serious issues involving congestion:

   • The site is adjacent to the most conjected road network in the country – Junction 10. The associated traffic of RHS events has not been taken into account.
   • The increased traffic on the route to Woking station has not been taken into account.

1. This conjestion results in increased air pollution which has NOT been taken into account by the plan.
2. This site will be facing the Surrey Hills AONB and will increase the negative impact of the views.
3. There is not sufficient employment available of site – nearly all residents will have to travel to work, resulting in increased conjestion.
4. In Appendix H p. 16 the change in site boundaries are not correctly identified.
5. I object to the development on flood zone 2 and 3 – whilst the plan “limits” the development in these zones, development should be EXCLUDED from these zones – they FLOOD!!
6. I object to the 10% buffer in the housing number. This is not needed.
7. I object to the apparent disregard for the impact of high pollution levels and nitrogen deposition.
8. I object to the extension of the plan period by one year as it has not been identified as a major change.
9. I object to paragraph 22 as it does not reflect as this does not reflect the impact of the buildings on the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5920  
Respondent: 10994817 / Alan Hill  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY A35 former Wisley Airfield I object because huge loss of productive agricultural land, prospect of massive traffic problems, lack of public transport links, surrendering to [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3990  
Respondent: 10997249 / John Flatman  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield

I wish to OBJECT to the draft Guildford Borough Council Local Plan, specifically because of the retained inclusion in that draft of the site at Three Farms Meadows (Wisley Airfield).

Although as a resident of Cobham I do not live within the boundary of Guildford Borough Council, I, my family, neighbours and all residents of Cobham village would be severely adversely affected by any development on this site. I am aware that GBC have a statutory obligation to consult with neighbouring boroughs and take full note of objections.

Our objections are:

1. the Three Farms Meadows (Wisley Airfield) site is a high-grade agricultural site in the middle of Green Belt land. GBC have an obligation to preserve such sites to prevent encroachment and infilling of the Green Belt.
2. GBC's likely future housing needs can be met through development of many available brownfield sites in the borough, which are far better located for access to transport, shops, educational and medical facilities, etc.
3. Although outside the Borough boundary, Cobham is the nearest shopping and transport hub to any development at Wisley. Any such development would overwhelm already critically challenged facilities such as road and rail transport links, schools and doctors' surgeries. A development at Wisley would, for instance, generate further congestion on commuter trains running through Cobham and Stoke d'Abernon station, already
with standing room only at rush hours. There is a desperate shortage of school places in the area, particularly secondary schooling.
4. Road traffic through Cobham would inevitably be increased. Already, traffic on the key A245 link from the A3 causes air pollution well in excess of statutory limits.

Any development in this location will severely damage the environment and quality of life of tens of thousands of local residents. The site should be removed from the GBC local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I am simply amazed that Three Farm Meadows has been left in the Local Plan following the unanimous vote against Wisley Property Investments back in April of this year. It all stinks of foul play and I would be interested to see what the reasons are as the reasons given for the planning refusal are not able to be fixed.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3399  Respondent: 11000289 / Nick Bomford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the development of over 2,000 houses at Ockham (former Wisley Airfield)

The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous. The plan also includes extensive and inappropriate developments at Burnt Common (400 houses & commercial developments) and Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2900  Respondent: 11000289 / Nick Bomford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport providers such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will, therefore, be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow, unlit local roads on a regular basis.

9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”. Opportunity (3) should be common to all sites and is not unique to this site.

12. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

13. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

14. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

15. I object to the removal of additional 3.1 ha from the green belt without any justification.

16. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

17. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

18. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

19. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

20. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

21. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

22. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

23. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

24. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

25. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

26. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

27. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

29. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

30. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

31. I object to the housing number and particularly the fact that the Council have not, as required, used any constraints such as the green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

32. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling, walking and horse riders. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) And to horse riders who use the local narrow lanes to access bridle paths in the area.
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• 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.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2994  Respondent: 11005377 / Peter Robinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am categorically against any development of homes on Wisley airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2573  Respondent: 11005697 / Mike Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed development of more than 2000 houses on the site of the former Wisley Airfield as the impact of this on the Horsleys which are less than 2 miles away would be completely unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1089  Respondent: 11005729 / Andrew Rowe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
3. 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.
4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisley Airfield Policy A35

I OBJECT to the inclusion of Wisley Airfield development in the local plan. No exceptional circumstances have been demonstrated for its removal from the Green Belt. This proposal has also been unanimously rejected by GBC’s planning committee because of grave concerns including traffic congestion, air pollution, lack of suitable public transport, unsustainability, the inappropriateness of an urban style development in this rural area, the major impact on local villages. These are all still relevant objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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.
6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCi).
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
I write to OBJECT to Amended planning application 15/P/00012 for the following reasons:

**Sustainability:** The site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which are already running over capacity.

- The application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit.
- There is no spare parking capacity at either of the local stations.
- Sites of this size are required to provide outdoor open space. The applicant has “double counted” the outdoor space with that required for SANGS
- The loss of high quality agricultural land is in contravention of policy.

**Air quality:** The air quality figures are based on an unreliable transport assessment.

- The applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source)
- Poor air quality is exacerbated in the area by temperature inversions which trap the air. Young and old are extremely susceptible to poor air quality.
- Air quality is not improving as fast as expected, partly due to the excessive emissions (VW et al)
- The impact of poor air quality on RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area (SPA) is already in excess of legal limits.

**Transport:** The transport assessment makes a number of erroneous assumptions and is not credible.

- It is completely unrealistic to assume that there will be a decrease in vehicle movements.
- There is no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children will have to be transported to the nearest available school in Leatherhead – adding to congestion.
- There appears to be no impact shown for the 270 daily bus movements or for the waste lorries or HGV deliveries to the site.
- The TRICS data used for comparison is not a relevant measure: site not comparable with a site in Guildford, nor a site 400m from the centre of Redhill, nor one on the edge of Staines.
- The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.
- The modelling in the Transport Assessment at 7 junctions close to the site bear no relationship to the daily experience of residents, evidencing flawed modelling
- The number of daily trips is understated in the region of 1000 vehicle movements.
- Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham/ Ripley/Downside and further afield.
• If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those needed by the RHS

**Appropriate development:** The site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the TBHSPA and the M25 to the north and the Conservation area of Ockham Village to the south.

- Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances which have not been demonstrated
- The site is not big enough to provide satisfactory living standards even for “affordable housing”.
- Four and five storey buildings are not appropriate in the rural environment nor on an elevated site.
- Residents will be crammed in with little outdoor space, a noisy location, with very poor air quality. The density of housing proposed is similar to that in Islington.
- The site is clearly visible from the Surrey Hills AONB and as a result it will have a negative impact on views to and from the AONB.

**Thames Basin Heath SPA/SSSI/SNCI:** The impact of 2,068 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species (including skylarks, nightjars and many others on the RSPB red list) in contravention of the EU Birds Directives and Habitats Regulations

- The siting of the proposed Suitable Alternative Natural Green Space (SANG) adjacent to the SPA will only increase visitor numbers causing further damage
- Part of the SANG is in a designated flood plain
- Para 119 of the NPPF “presumption in favour of sustainable development” does not apply where development requires assessment under the Birds or Habitat Directives
- It is impossible to state without doubt that the mitigation proposed will prevent damage to the SPA particularly in the light of inadequate traffic/air quality reports.
- There are likely to be over 700 dogs and 700 cats living on the proposed development. These will be a constant threat to ground nesting birds on the SPA and cannot be mitigated by one warden working a normal working day.

**Impact on the local area:** The additional 5,000 residents is the equivalent of almost doubling the population of East and West Horsley combined. This increase in local population will impact:

- Light pollution, noise, traffic and infrastructure which has been gravely underestimated and proposed mitigation measures are totally inadequate
- The cumulative development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge per the objections from both Elmbridge Borough Council and Woking B C
- The water table and flooding in the area. It appears that no impact assessment has been done relating to the loss of agricultural land which currently soaks up a significant volume of rainwater.
- Listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm
- Via closure of a number of local roads coupled with an increase in traffic will affect a large number of road users from Cranleigh to Cobham and everywhere in between

**Inaccuracy of the documentation:** There are factual errors in the documentation

- Highways England have recommended that the proposal cannot be determined due to the applicants failure to provide traffic data in the format required
- There are a number of misrepresentations in the paperwork e.g. nine stations within 5 miles – this is however “as the crow” flies – only Horsley and Effingham Junction are within 5 miles by usable road from the middle of the development
- The applicant’s description of the site as brownfield is a gross over-simplification. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remaining runway, a habitat for rare flora and fauna, (14ha) has never had buildings. The remainder of the site (55%) is high quality agricultural land.
Other: This site is not deliverable within 5 years due to problems with sewerage and water capacity, outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

- No very special or exceptional circumstances exist - Alternative sites exist
- The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan
- The site is not listed for development under the existing 2003 Local Plan
- There is not enough land to provide a sustainable community based on GBC’s own parameters
- There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

I trust the Council will find this useful, in their deliberations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8052  Respondent: 11009057 / Lucy Fairley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am strongly opposed to development of Site A35, former Wisley airfield. This site is a large area of current Green Belt which provides protected open space near the M25 and is a barrier to outward development from London. Creating this new settlement would cause irrevocable harm to the Green Belt and environment. It would also overwhelm local roads (from a traffic perspective) and local facilities/services (shops, health centre, railway services, schools). I am appalled at the inclusion of this site within the Local Plan as it was subject to a recent planning application (15/P/00012) which was unanimously rejected by the Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3297  Respondent: 11009057 / Lucy Fairley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am opposed to development of Site A35: 2,000 homes on Former Wisley Airfield, Ockham. Creating this new settlement would cause irrevocable harm to the Green Belt. It would also overwhelm local roads and local facilities/services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4479  Respondent: 11009281 / David Foot  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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 build houses on the former Wisley Airfield. When this site was the subject of a planning application, it was refused by your Councillors without reservations. Well done! So why has it been restored as a candidate building site in the local Plan? My objection to building at Wisley is for both environmental and infrastructure reasons which were well articulated at the GBC planning hearing, and which have not been subsequently addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4181   Respondent: 11010273 / Dave Brownjohn   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A3 Corridor Development

- There is a disproportionate number of new homes and associated development on Gosden Hill Farm, which will significantly and adversely change the appearance and nature of Burpham the area, and the north eastern side of Guildford in its entirety.
- The combined developments of Wisley and Gosden Hill Farm represent too large a proportion of the overall Guildford plan developments, bearing in mind that of the proposed number of homes approx. 5,000 homes will be on this side of Guildford (incl about 1,000 homes in Send, Horsley, Burnt Common and Ripley in smaller individual developments).
- There has been no clear justification for the number of new homes to be built in Guildford, plus the consequent need of more employment space. How was this figure obtained? Just telling us that independent consultants were employed is not sufficient.
- The proposed designation of the employment site on Gosden Hill Farm as a Strategic Employment Site lacks any definitive justification, and will lead to increasing commercial development in future years, and thence to increased stress on the local infrastructure. It will further deteriorate the attraction of the local area to the disadvantage of existing Burpham and Clandon residents.
- There is a severe danger of significant loss of Green Belt, and the creation of an A3 conurbation stretching from Guildford northwards to encompass Ripley and Wisley, effectively all the way to the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/234   Respondent: 11010497 / John Ackerman   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I have attended a presentation at East Horsley Village hall and discussed the impact of the local plan with several of your officers who were there. The only amendments to the rejected Wisley airfield project was a slight expansion of the area with no increase in additional housing – wow. There is an arrogance in this that, despite huge objections and a rejection of the plans by the Planning Office, that they believe they can find a way to push it through. In essence, we don’t give a damn about the local residents. We are the power and you will do what we say.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/235  Respondent: 11010497 / John Ackerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to OBJECT to Amended planning application 15/P/00012 for the following reasons:

**Sustainability:** The site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which are already running over capacity.

- The application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit.
- There is no spare parking capacity at either of the local stations.
- Sites of this size are required to provide outdoor open space. The applicant has “double counted” the outdoor space with that required for SANGS
- The loss of high quality agricultural land is in contravention of policy.

**Air quality:** The air quality figures are based on an unreliable transport assessment.

- The applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source)
- Poor air quality is exacerbated in the area by temperature inversions which trap the air. Young and old are extremely susceptible to poor air quality.
- Air quality is not improving as fast as expected, partly due to the excessive emissions (VW et al)
- The impact of poor air quality on RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area (SPA) is already in excess of legal limits.

**Transport:** The transport assessment makes a number of erroneous assumptions and is not credible.

- It is completely unrealistic to assume that there will be a decrease in vehicle movements.
- There is no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children will have to be transported to the nearest available school in Leatherhead – adding to congestion.
- There appears to be no impact shown for the 270 daily bus movements or for the waste lorries or HGV deliveries to the site.
- The TRICS data used for comparison is not a relevant measure: site not comparable with a site in Guildford, nor a site 400m from the centre of Redhill, nor one on the edge of Staines.
- The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.
- The modelling in the Transport Assessment at 7 junctions close to the site bear no relationship to the daily experience of residents, evidencing flawed modelling
- The number of daily trips is understated in the region of 1000 vehicle movements.
Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham/ Ripley/Downside and further afield.

If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those needed by the RHS

**Appropriate development:** The site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the TBHSPA and the M25 to the north and the Conservation area of Ockham Village to the south.

- Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances which have not been demonstrated
- The site is not big enough to provide satisfactory living standards even for “affordable housing”.
- Four and five storey buildings are not appropriate in the rural environment nor on an elevated site.
- Residents will be crammed in with little outdoor space, a noisy location, with very poor air quality. The density of housing proposed is similar to that in Islington.
- The site is clearly visible from the Surrey Hills AONB and as a result it will have a negative impact on views to and from the AONB.

**Thames Basin Heath SPA/SSSI/SNCI:** The impact of 2,068 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species (including skylarks, nightjars and many others on the RSPB red list) in contravention of the EU Birds Directives and Habitats Regulations

- The siting of the proposed Suitable Alternative Natural Green Space (SANG) adjacent to the SPA will only increase visitor numbers causing further damage
- Part of the SANG is in a designated flood plain
- Para 119 of the NPPF “presumption in favour of sustainable development” does not apply where development requires assessment under the Birds or Habitat Directives
- It is impossible to state without doubt that the mitigation proposed will prevent damage to the SPA particularly in the light of inadequate traffic/air quality reports.
- There are likely to be over 700 dogs and 700 cats living on the proposed development. These will be a constant threat to ground nesting birds on the SPA and cannot be mitigated by one warden working a normal working day.

**Impact on the local area:** The additional 5,000 residents is the equivalent of almost doubling the population of East and West Horsley combined. This increase in local population will impact:

- Light pollution, noise, traffic and infrastructure which has been gravely underestimated and proposed mitigation measures are totally inadequate
- The cumulative development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge per the objections from both Elmbridge Borough Council and Woking BC
- The water table and flooding in the area. It appears that no impact assessment has been done relating to the loss of agricultural land which currently soaks up a significant volume of rainwater.
- Listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm
- Via closure of a number of local roads coupled with an increase in traffic will affect a large number of road users from Cranleigh to Cobham and everywhere in between

**Inaccuracy of the documentation:** There are factual errors in the documentation

- Highways England have recommended that the proposal cannot be determined due to the applicants failure to provide traffic data in the format required
- There are a number of misrepresentations in the paperwork e.g. nine stations within 5 miles – this is however “as the crow” flies – only Horsley and Effingham Junction are within 5 miles by usable road from the middle of the development
- The applicant’s description of the site as brownfield is a gross over-simplification. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remaining runway, a habitat for rare flora and fauna, (14ha) has never had buildings. The remainder of the site (55%) is high quality agricultural land.
**Other:** This site is not deliverable within 5 years due to problems with sewerage and water capacity, outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

- No very special or exceptional circumstances exist - Alternative sites exist
- The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan
- The site is not listed for development under the existing 2003 Local Plan
- There is not enough land to provide a sustainable community based on GBC’s own parameters
- There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

I trust the Council will find this useful, in their deliberations

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3634  **Respondent:** 11010945 / Stephen Gill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I continue to object to the inclusion of policy A35, Three Farms Meadows (formerly, the Former Wisley Airfield), in the proposed Submission Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the draft Plan because of the constraints applicable to this area of Green Belt and nature conservation protected land, and its physical location. I object to its continued inclusion in the Plan.
2. This is Green Belt, high quality, farmland, a nature conservation area in and of itself, and immediately adjacent to an SSSI and SPA. Conservation area Ockham Village, including many listed buildings, borders this area of land.
3. It is surrounded by narrow, winding, weight-restricted, country lanes unsuited to any increase in traffic – let alone the approximately 5000 cars likely to result from a housing development of 2100 houses, or the heavy construction vehicles likely to be needed - over many years – for its construction.
4. The transport evidence base including the SHAR 2016 Highways assessment report has been criticised by Mouchel for using out of date modelling software and is therefore unreliable, thus making all transport predictions unreliable and unrealistic.
5. The statement that sustainable methods of travel such as cycling and walking would be used for access to and from the site are totally unrealistic. The roads in the vicinity are already dangerous for walkers & cyclists and will be made even more so with the increased traffic that will come from the site.
6. Almost all residents will have to travel from the site to work. People will not walk/cycle on narrow unlit local roads on a regular basis – they will travel by car. This additional vehicular traffic will both make the roads more dangerous for other users and add to the congestion.
7. It has no infrastructure at all - it is Green Belt, high quality, farmland, and therefore has no gas, water, electricity or sewage connections, and no buildings at all. It is also prone to flooding in parts, making drainage from 2100 houses on concreted over land a particular challenge but one which appears not to have been properly considered.
8. It is remote from railway stations and there is currently no public transport that serves the area, and nor is the area suitable for public transport. These are narrow, winding, weight-restricted country lanes.
9. The facilities at the closest railway station are already at capacity, are as the rains during peak hours. The increased demand from the site cannot be absorbed.
10. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs.
11. The site is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS traffic together with the increased traffic from regular events at the RHS have not been taken into account in traffic assessments.
12. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
13. Local schools, surgeries and railway stations/trains are already full, and there are no obvious local employment opportunities for 2,100 households (assuming 2 adults per dwelling, that equates to 4,200 jobs).
14. It is not clear who would want to live in this new dormitory town, remote from employment, entertainment and any form of infrastructure, where the householders would be entirely dependent on their cars.
15. Housing need - and the figures relied upon by the Council – is anything but transparent, despite requests for information about the basis for the Council’s/its agent’s calculations. Housing “need” is a very different thing from the “demand” for housing in Guildford. Despite this, I understand that adjoining boroughs have made very different (and much lower) assessments of their “housing need”. Guildford need to review their methods of assessment for housing need and bring them in line with other neighbouring councils.
16. I understand that Surrey University has planning permission to build, on its own campus, sufficient accommodation for all of its students, but has failed to implement that permission. It should be made to do this, freeing up housing stock in Guildford town centre which by default has all the necessary infrastructure and support for additional housing.
17. Guildford town centre – Walnut Tree Close, for example – already has significant areas of former built/industrial development, again with pre-existing infrastructure in place. Sustainable housing development should clearly be concentrated here.
18. I object to the quantity of space allocated for retail in Guildford 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 in administration.
19. I object to the fact that the Council has still failed to remove the Three Farms Meadows (site A35) from the Plan despite receiving 1000s of objections to its inclusion - from residents and from statutory consultees. There appears to be no clear justification for the removal of one (other) strategic site from the Plan. Why hasn’t Three Farms Meadows (site A35) been removed? What is the justification for the removal of the other site? Three Farms Meadows (site A35) should now be removed from the Plan.
20. I understand that the Council considers that there should be consultation only on the changes it proposes should be made from the previous version Plan. I object to this. Many people will therefore be discouraged from participating in this consultation, and will not appreciate quite how much has changed from the previous version Plan. Moreover, the complexity and length of reports/documents, many of which are not available in hard copy, further discourages debate and participation in it.
21. I object to the timing of this consultation – yet again in the context of the local plan/proposals in relation to Three Farms Meadows, time limits for submission of comments/objections expire during the school summer holidays – once again limiting debate.
22. I object to the fact that there has been no clear explanation from the Council as to why it thinks it is appropriate to have a (limited) regulation 19 consultation. I believe the proposed changes to the Plan are major.
23. I object to the proposed increase in the size of site A35 (Three Farms Meadows) as this now abuts additional heritage assets, including Upton Farm and Bridge End House, further adversely impacting the setting of these buildings and the wider Ockham Conservation Area.
24. I object to the proposed increase in site A35 (Three Farms Meadows) that the proposed change of site boundaries to site A35 (Three Farms Meadows) would entail.
25. I object to the fact that the proposed increase in site area, being on the south side of site A35 (Three Farms Meadows) and facing (therefore) the Surrey Hills AONB, will increase the negative impact of the views from the AONB.
26. I object to the proposed change of site boundaries to site A35 (Three Farms Meadows). Nor are these identified correctly on the plan (Appendix H p16)
27. I object to the proposed removal of an additional 3.1 ha from the Green Belt that the proposed change of site boundaries to site A35 (Three Farms Meadows) would entail.
28. I object to the change in Green Belt boundary to the eastern end of site A35 (Three Farms Meadows), as this now encloses an area of high archaeological impact.
29. I object to the inclusion in the Plan of site A35 (Three Farms Meadows) as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
30. I object to the extension of the Plan period by 1 year – this is a major change and as such this current review
should be of the whole Plan and not just the changes.
31. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly
the damage caused by nitrogen deposition and high pollution levels.
32. I object to the idea – mooted by the Council at one point of this process – that loss of Green Belt land in one
part of Guildford Borough could be “compensated” by the re-designation of other land, in another part of the
Borough, as Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/922  Respondent: 11010977 / Hilary S Foulkes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

2) Similarly, it makes no sense to remove the Wisley site from the Green The site serves a vital role in protecting against
urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford.
No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) It also appears that a disproportionate percentage of the development is being targeted at our bucolic corner of the
borough, notwithstanding the Greenbelt and infrastructure issues.
4) The proposed development of the site would pose a threat to the historic rural village of Ockham and create a blight on
properties there. There would be knock-on negative effects on the small hamlet surrounding Ockham Mill, where I live.
5) There would be very negative effects on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too
isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000
additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas,
exacerbated by wide vehicles including increased bus and HGV
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the
Jack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and No development
can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on
the A3 south of the site are not due to start until 2019 at the earliest. I already have difficulty exiting Mill Lane
in the morning en route to Horsley. Adding more traffic to the Ripley exit roundabout will make it impossible
for me to exit.
6. The lack of suitable public transport. The local rail station of Horsley cannot cope with the proposed increase in
passenger traffic and car parking is already at capacity. I use the Horsley station parking Jot and it's completely
full every day-where are the additional cars supposed to go?

6) Insufficient consideration has been given to the environmental and ecological value of the site, in relation to the
Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature
Conservation Interest (SNI).}

7) I live downstream from the site in a flood-prone location and there has not been adequate attention paid to the
increased flooding risks created by the development
8) Air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted limits. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. I worry about the health of my children.

9) I don't understand why the site has been included after the related planning application has already been unanimously rejected by GBC's Planning Committee. It makes me wonder whether the developer has exercised undue influence on the process, and I have to question the motivation behind the decision to retain this site in the plan.

I ask that the Council reconsider and now, once and for all, remove this site from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4198  Respondent: 11011585 / Martin Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development of 2,000 houses at Wisley Airfield as it will destroy large areas of Green Belt and agricultural land and produce massive congestion on the A3 and surrounding roads including Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3163  Respondent: 11011969 / Diana Gibson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1710  Respondent: 11012097 / John & Jean Waters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the plan to build a town on the site of the former Wisley Airfield, one of the green belt areas on which a large scale development is proposed. This would lead to a great increase in traffic close to the busy A3 road and a very real threat to the beautiful and renowned RHS Garden at Wisley because of higher levels of pollution. The wildlife habitat of the former airfield would also be destroyed and lost for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
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enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farms Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green Belt land. There were a number of Election manifesto promises to the electorate which have been ignored in this regard.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

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   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Commuter trains are already at bursting point. The recent addition of two coaches (from 8 to 10) have done little to ease the congestion and it is often impossible to board the Horsley train at Waterloo. Passengers are regularly helped off the train en route because of overcrowding on the inward journey. Even allowing for a small proportion of occupants of the proposed development being commuters would put an impossible burden on the existing services.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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10) 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.

11) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/2129</th>
<th>Respondent:</th>
<th>11014369 / Geraldine Wright</th>
<th>Agent:</th>
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1. I object to policy S2 where it states ‘the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
2. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
3. 26 I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
4. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations. There should be a clear statement as to how this has been allowed to happen.
5. I object to the extension of the plan period by 1 year as it has not been identified as a major change
6. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
7. 18 I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. What is being done in this regard?
8. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
9. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
10. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
11. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building. All the arguments with regard to conservation in the area apply.
12. 8. I object that the changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
13. There is insufficient employment opportunities on the proposed site. All residents will therefore need to travel to work by public or private means.
14. Additional visitors to the RHS Wisley have not been included.
15. Local roads are at capacity and increased public transport would have to negotiate over already overcrowded SRN. They would be unable to offer a reliable service.
16. The site is further from the railway station than any other proposed site. This station has insufficient trains to deal with increased passengers and a very small car park which is already filled to capacity. There is no scope to increase the size of the car park.
17. I object to the application of new housing on the old Wisley Airfield on the ground that it is the least sustainable strategic site in either version primarily due to its physical location.
18. Its location to the M25 at J10 and the A3 means overloading one of the most congested junctions in SE England.
19. Additional bus services would compromise the safety of those cycling and walking in the area.
20. Reliance on Woking Station is unsustainable. Woking is already at capacity in terms of the station itself and nearby parking.
21. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
22. I believe that opportunity (3) should be common to all sites and is not unique to this site. I object that insufficient consideration has been given to this.
23. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB. What has been done in this regard?
24. I object to the removal of additional 3.1 ha from the green belt without any justification.
25. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
26. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
27. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
28. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
29. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
30. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. No reasonable explanation has been given for this.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
33. 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.

I therefore consider that this plan is unsound and not fit for purpose and must be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10. Lastly, I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/938  Respondent: 11014401 / Peter Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. No habitats assessment has been carried out.

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7102  Respondent: 11014753 / Ian Peel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In the wider picture I object for similar reasons to those above to your unsustainable plans for Ockham, Wisley, Ripley. There is simply NO EVIDENCE to support the need for housing on this gargantuan scale, and this proposed gargantuan scale of population growth simply cannot be supported by our local roads, schools and other infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/1233</th>
<th>Respondent: 11014881 / Linda Peters-Smith</th>
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1. **Three Farms Meadow site (site A35)**

I object.

The re-inclusion of this site is very disappointing following the public outcry for its previous inclusion and the rejection of a recent planning application.

It should be removed as it is in the Green Belt, less than 15% is brownfield and the former runway has never had buildings on it. The former runway is a Special Protected Area.

The infrastructure can't cope with the increased traffic and pressure on services it will create.

The cost of improving the infrastructure will mean alternative sites will be more viable if included in the assessment.

It is also disproportional to build 2000 homes in a village of 159. It will also have adverse effects on the Horsleys and put pressure on the Horsley station.

Please reconsider and make the appropriate changes in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/4000</th>
<th>Respondent: 11015329 / Nick Riederer</th>
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7. I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (M25, J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. The local road infrastructure has had little to no investment in recent years and any increase in traffic will further degrade/destroy the road surfaces and appalling levels of subsidence.
6. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
7. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally impractical and unsafe.
8. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers are likely to increase significantly year on year.
9. The associated traffic increase from the RHS has not been taken into account.
10. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
12. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
13. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
14. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
15. Opportunity (3) should be common to all sites and is not unique to this site.
16. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
17. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
18. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
19. I object to the removal of additional 3.1 ha from the green belt without any justification.
20. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
21. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
22. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
23. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
24. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
25. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
26. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
27. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
28. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
29. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
30. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
31. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
32. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
33. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
34. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
35. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

36. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

37. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

38. 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. This is a blatant bulldozing of the Green Belt Policy
2. The local roads - including the A3 and M25 - already cannot cope with the current traffic - both cars, lorries, buses and bicycles and this plan proposes the addition of thousands more of those.
1. There is inadequate schooling already and these additional dwellings would put further pressure on those in existence.
1. Medical facilities - hospitals, surgeries - cannot cope already so they will not cope with these additional residents and workers
1. There are no pavements throughout the village of Ockham and much of the surrounding villages (e.g. Ripley, East Horsley) to accommodate safely these extra people proposed on the plan.
1. Railway station facilities for parking at Effingham Junction and East Horsley cannot cope with current demands so they will not cope with these additional numbers of cars.
1. The plan destroys the tranquil environment that we residents have had to pay very dearly to be able to enjoy so the plan is unacceptable on noise pollution levels too.
1. Our democratic right to express our feelings against this plan was put to the test and carried forward at a Council meeting, only to be overturned by Guildford Council - that is NOT democracy!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2400  Respondent: 11023329 / Carol Cordrey  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We have lived in Ockham for 35 years, adjacent to the farming land that was known as the Wisley Airfield and which now forms Policy A35 - Three Farm Meadows. We object, once again, to the inclusion of this land in the draft Local Plan on the basis of the following points:-

- Its proximity to already congested roads - A3 and M25 Junction 10 - and the current huge traffic flowing on nearby roads
- Your suggestions of public transport in the area will meet with this existing congestion and even add to it!
- Wisley RHS Gardens already attract massive visitor numbers using cars and coaches and its current extension programme is destined to attract many thousands more. This will intensify congestion
• New residents to Three Farm Meadows will have to add to road congestion to access essential employment as little is available in the local area or in the proposed development

• Your proposal to include Upton Farm in the site will negatively effect its beautiful, historic location. The same applies to the extension of the area you propose as it will negatively impact the Surrey Hills AONB

• The boundaries on the plan are incorrectly identified

• Your plan should not simply LIMIT development in FLOOD ZONES 2 & 3. You should EXCLUDE development there

• You have ignored thousands of democratic objections to the Plan and wasted tax-payers'/residents’ money

• Major adjustments have been made to the Plan so that it does not conform to a Regulation 19 Consultation

• The vast housing number you agree to and we object to drives a proverbial steamroller across key restraints of green-belt, air quality, AONB and other key policies that we residents abide by

• The area around the Plan is already effected adversely by inadequate schooling, train station car parking and medical centre facilities. You plan would dramatically worsen these.

• Policy S2 refers to the Housing Target table amounting to 12,426 but your calculations are wrong as the actual sum is 9,810!

• Finally, your Plan will ruin the existing ambience and quality of life that residents have paid dearly to enjoy and uphold against the odds of your political ambitions. You will ruin many lives, compensate nobody and overturn our democratic rights, all of which you should be ashamed of if not sacked for!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 11023777 / Cynthia Parise</th>
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Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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.
6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed...
increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I hope that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3107  Respondent: 11024769 / Sarah Runton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

The proposal is based on flawed details particularly regarding transport to train stations and the small roads, ill suited to a development of this size. Clandon has an A road through it, Ockham is adjacent to two huge roads that are already severely congested with smaller artery roads of very poor quality and poorly lit. Of all the proposals for a large development it is the least sustainable strategic site identified by the Council because of the constraints on the site and the physical location.

It is also further away from rail stations than any other considered site and uses ‘as the crow flies’ distances rather than distance by road. It is also important to point out that whenever a bus goes through Horsley towards Horsley Towers that any cars passing on the other carriage way often either have to stop or mount the pavement to allow space to pass, severely impacting local safety to residents and drivers.

There is not enough employment opportunities on the site meaning the majority of those working will have to drive to reach their destination or to the local stations. The M25 at this junction is one of the busiest in the country and the A3 is also severely congested at this point during rush hour. A development so close to this area will only exacerbate what is already a severe traffic problem.

There seems to be a disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels. Studies from bodies such as the World Health Organisation clearly outline issues in children’s development in particular in areas of poor air pollution.

There are also numerous inaccuracies. For example in S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound and its assumptions flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7343  Respondent: 11027137 / I Pennells  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
A35 Land at former Wisley airfield, Ockham

- The local adjoining roads do not have sufficient capacity (especially at rush hour) to take additional traffic that would be generated by this development.
- Public transport is not sufficient meeting demand of potential additional passengers to encourage vehicles to be left at home to undertake local journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2866   Respondent: 11027457 / Nigel Austin   Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored .
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley's (of which 65% is allocated to FWA/TFM, an area that at present has only 3% of the population of GBC).
- 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.
- I object to the detrimental impact on transport, local roads and road I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walki The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  1. The increased volume of car traffic . A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  2. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  3. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  4. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

1. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

   • I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   • I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   • I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. 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.
   • I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Officers.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.'s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7000  Respondent: 11027649 / Phyllis Charteris-Black  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley Airfield

The inclusion of the Wisley Airfield site for development in the final draft plan does not seem to have had any impact on the number of areas included in East and West Horsley. I cannot follow this reasoning; clearly the Wisley Airfield development would have a significant impact on East and West Horsley, even given the provision of an additional doctors surgery and primary school at the Wisley site. There would in particular be increased traffic on the local roads. I do not believe that the GBC has looked at the width of the Ockham Road North and South and considered the issues of increased construction traffic if all sites are developed and the general increased car usage going forward; the new denizens of Wisley will not stay in the new development for all their shopping, work transport and leisure needs and account must be taken of the additional impact on East and West Horsley. I do not think the new raft plan as it stands reflects this and so is defective. If the number of sites for development in Horsley had been reduced in consideration of the Wisley site being included it would have shown GBC applying some type of rational balance.
6. Wisley

The proposal to build over 2,000 houses on the Wisley Airfield is most alarming:
• it almost equals the total number of dwelling in the villages of East and West Horsley combined, and dwarfs the neighbouring villages of Ockham and Wisley. It would change the nature of this area irrevocably, and not for the better!
• It would take many years for such a huge and sudden increase in population to be integrated into the Horsleys, Ockham and Wisley.
• It would put unsustainable pressure on the existing roads, schools and medical services.

The development needs to include a doctors' surgery; children's play facilities; secondary, as well as primary school spaces; and a railway station.

I do not object to appropriate housing development on the proposed brown-field sites, such as those opposite Bell and Colvill [West Horsley] and the BT land opposite Bishopsmead Parade [East Horsley].

The land abutting Great Ridings Wood in Norrels Drive, East Horsley is valuable in protecting the Woodland Trust land from being encroached upon, and vehicular access along Norrels Drive is restricted.

I therefore appeal to the Council

• to reconsider the plan;
• to reduce the number of homes proposed,
• to protect our green field sites, and to amend the Plan in favour of brown-field or re-development sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2538  Respondent: 11029409 / John Lay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1979  Respondent: 11029441 / David Tagg  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The plan to build 2,000 homes on the old Wisley Airfield is also, in our opinion far too large to be sustainable & should be greatly reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6976  Respondent: 11032097 / Sue King  Agent:
Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farm Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) -
where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/7246  **Respondent:** 11033057 / Jo Komisarczuk  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I Object to the proposed sites at Wisley Airfield (A35) and Garlicks Arch (A43) are unsustainable locations they cannot be reached by public transport, train stations and bus routes, and will force all occupants of the proposed properties to be dependent on cars. As the local roads around these sites are lanes which are already at or above capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3122  **Respondent:** 11033985 / John Peachey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the large proposed development at Site (A35 - 2,000 houses at former Wisley Airfield (already rejected by GBC), Site A25 - 2,000 houses at Gosden Hill Farm and the 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/4615  **Respondent:** 11034913 / Alison Hutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the proposed sites at Wisley Airfield (A35) and Garlicks Arch (A43) are unsustainable locations they cannot be reached by public transport, train stations and bus routes, and will force all occupants of the proposed properties to be dependent on cars. As the local roads around these sites are lanes which are already at or above capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to the Development of Wisley Airfield on the basis of:

Volume of houses and their occupants - This is a whole new town

According to the Census of 2011, both Horsleys have a combined population of 5,118. 2,000 new houses would have a population, given some single person accommodation and some families of at least 5,000 people. This would swamp the surrounding villages, their roads, health services and schools.

Transport. Our local roads are already overcrowded. The M25 is regularly gridlocked and access to the A3 on a ‘consented direct access’ can only increase the congestion. If each household has just one extra car, this will be an additional 2,000 cars. It is more likely that each family will have more than one car especially since the nearest railway station is only reachable by bicycle or bus rather than on foot.

Increased Air Pollution. Resulting from more vehicles in the long term and many HGVs during construction of the site.

If you require further proof, take the A429 past Jennett’s Park in Bracknell, 1500 houses planned. First opened in 2009/2010, still looks like a raw building site. We do not need 2,000 new houses at Wisley Airfield.

WRONG PROJECT IN THE WRONG PLACE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1812  Respondent: 11034913 / Alison Hutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals for over 2000 houses at Wisley.

The existing levels of pollution and traffic congestion will not be solved by adding 2,000 homes and association development to this area. It is too too large for the area given its proximity to already congested roads and too large to be accommodated within the Community. There will be a total gridlock of traffic. Furthermore 2,000 houses will never be absorbed into the existing small villages in this area.

Several applications for this development have been turned down but the GBC Executive refuses to listen to any objection and seems determined to go ahead with this development, even after all the Councillors rejected the last application. The site was returned to the Draft Local Plan within days of this decision. Five storey flats would be an eyesore from all points of the Downs. The site is very visible as it is on a dome of land. At present, the airstrip, which should have been removed after its war-time requisitioning, is not visible among the green fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2677  Respondent: 11036001 / Peggy Bonnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

  6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean *either* major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Sustainability

The Former Wisley Airfield is within the least accessible part of Guildford Borough, remote from rail stations with poor local roads and lengthy bus routes and, given the proximity of the A3, it is implausible that development would be prove to be attractive and safe for cyclists. The development is too small to be self-sustaining and yet large enough to cause substantial adverse impact.

Deliverability

The site was subject of a recent planning application for a quantum of development comparable to that in the Proposed Submission Local Plan and with a very similar boundary. The application was recommended for refusal and refused unanimously in April 2016. Despite 15 months of negotiation with the applicant, Wisley Property Investment Ltd (WPIL), additional issues of impact on the Special Protection Area (SPA), impacts on the strategic and local highways network, sustainable transport, affordable housing, air quality and education could not be resolved. The failure of the planning application confirms that there is no reasonable prospect that the project can be delivered.

Soundness

The reasons for refusal of the planning application submitted by WPIL and the failure of the applicant to resolve issues for a proposed development comparable to the Local Plan allocation confirm that the allocation is unsound. The allocation i) does not provide sustainable development ii) is not supported by exceptional circumstances to justify removal of the Green Belt designation and iii) lacks realistic prospects of delivery.

I OBJECT to the removal of East Horsley and West Horsley from the Green Belt. The NPPF requires the provision of exceptional circumstances to justify alteration of the Green Belt Boundary. The Council has failed to provide the necessary justification. Therefore, allocations A36 Hotel at Guildford Road East Horsley, A37 land at the rear of Bell and Colvill Epsom Road West Horsley, A38 land west of West Horsley, A39 land near Horsley railway station Ockham Road North West Horsley, A40 land north West Horsley and A41 land south of West Horsley should be deleted as allocations for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3222  Respondent: 11036801 / Judith Mercer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

5.Policy A35 (Wisley)
I object to the changed policy A35 Wisley regarding the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads. Traffic will need to pass through Ripley to reach Wisley. My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow alias the former Wisley airfield, Ockham) because:
- following huge public objection, Guildford Planning Committee have unanimously refused a recent planning application for precisely this development on 14 separate grounds. However this site has been reinserted in the draft local plan in a deceitful way showing complete contempt for the borough residents. This was done only 24 hours before the planning decision, therefore showing developers they could try again
- there is no need for housing on this site because it is based on the local plan housing target which is incorrect, and inflated and ignores constraints. The SHMA by GL Hearn has been found to be flawed and based on unverified and unscrutinised methodology. The provider of this assessment (GL Hearn) have not revealed their workings by which they produce the “housing need number” on behalf of the GBC. GBC in turn have failed to request this information from GL.
Hearn by not enforcing their Contract of Services with the said GL Hearn, which can be found in the GBC (Appendix 1) Standard Terms and Conditions of Provision of Services—which may be seen on the internet. One must conclude therefore that because of the inability of GBC to inform the consultation process of the information required, the entire SHMA should be disregarded for the purposes of evidence supporting this local plan.
-Policy A35 should be deleted from the plan for all the reasons the proposed development was rejected by the Planning Committee, including:-

-all the reasons given in my previous objection to the site proposed in the draft plan 2016
-it is Green Belt location and no “exceptional circumstances” are given
-misrepresentation of the site as brownfield land. Less than 15% is brownfield, it is adjacent to the SPA and therefore within 400m exclusion zone for housing. The remains of the runway are now a habitat for flora and fauna and never had buildings on it
-proximity to TBHSPA (Thames Basin Heath Special Protection Area)
-proximity to A3/M25 bottleneck area
-absence of adequate traffic data
-further harm to air quality both onsite and nearby
-loss of high quality agricultural land (55% of the site) in breach of national policy
-inappropriate location of over 2000 dwellings within the ancient village of Ockham which only has 159 households
-preservation of Surrey County Council safeguarded waste site
-cost of infrastructure needed would be detrimental to alternative more favourable sites
-damage to neighbouring communities of creating a settlement of 5000 residents equivalent to East and West Horsley combined with all the pollution that would entail namely light, noise, traffic and competition for local amenities and infrastructure
-impact of potential flooding
-failure to evaluate and therefore take seriously the cumulative impact of this and nearby development sites on the area
-I object to this Policy A35 as it would constitute a breach of NPPF law namely paras. 79-90. In particular all of it would be in breach of preserving the openness of the Green Belt (see case law and Boot v Elmbridge Borough Council February 2017). In view of the above in my opinion this policy should be removed from the local plan 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Building 2000 homes on the former Wisley Airfield site is the wrong place to build a new town/village. Where are these people expected to work? Most will have to commute which if by car will add further congestion to the already congested A3/M25 and local roads, not to mention an increase in green house gases and pollution – hardly an environmentally friendly option. If they commute by train which station are they supposed to use? Horsley & Effingham Junction car parks are already over-flowing on week days.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5671 Respondent: 11039105 / Robert and Judith Warren Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Three Farms Meadow (Ockham)

I object. 2000 isolated houses are proposed there in another disproportionate development. There are many arguments for objecting to this site being in the Plan at all given that a planning application has already been rejected on 14 separate grounds, however the development will have a considerable negative impact on the Horsleys particularly if the promised infrastructure facilities do not materialise, as is often the case under “viability” pressure from developers. This site should never have made it into the Draft Plan published after the recent planning decision. There seems to have been no consideration of the cumulative impact of this site and the excessive development proposed in the Horsleys and further review is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4829 Respondent: 11039681 / Bruce Jeffreson Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2968  Respondent: 11040609 / Simon Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4027  Respondent: 11040705 / Patricia Cullimore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE WISLEY AIRFIELD SITE STILL BEING ON THE LOCAL PLAN. The idea of 2,000 new homes is unreasonable and totally unsustainable. Are you able to produce proof that all this housing is required in this area? I think not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5749  Respondent: 11040737 / Jonathan Whitmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley’s (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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.
6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
   7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
7. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
8. 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.
9. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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 A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

#### Policy A35 Wisley – Objection

- The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction to relieve the impact of this development on Ripley do get built, traffic on the A247 will increase dramatically and unsustainably.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: pslp172/4263  Respondent: 11041601 / Robert Bayley  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the changed Policy A35 Wisley

- The two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.
- My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. This is disgraceful!
- There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPS16/5663  Respondent: 11042401 / Richard Gray  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the changed Policy A35 Wisley

- The two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.
- My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. This is disgraceful!
- There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I am writing to object strongly to Guildford Borough Council’s local plan for housing and development. As a resident of East Horsley I am disappointed by the proposals, these will damage the character of the village.. There are not enough local services to cope with this.

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) 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.

9) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

It would seem that GBC is taking no notice of the concerns of residents, and has not made any attempt to explain why it feels that re-drawing Green Belt boundaries is justified. We are therefore voicing our strong objection to the Local Plan, which does not solve the housing problem in a way that maintains the charm of our Surrey village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4359</th>
<th>Respondent: 11043073 / Ingrid Botha</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I object to the large proposed development of 2,000 houses at Wisley Airfield as it will destroy large areas of Green Belt and agricultural land and produce massive congestion on the A3 and surrounding roads including Ripley and Send.

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: PSLPS16/5518</th>
<th>Respondent: 11043425 / Melinda McLean</th>
<th>Agent:</th>
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</table>

I strongly object to the development of the Wisley Airfield site A35 - 2000 homes are completely unsustainable and shouldn’t be built on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3461</th>
<th>Respondent: 11043425 / Melinda McLean</th>
<th>Agent:</th>
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</tbody>
</table>
I continue to object to the development of the Wisley Airfield site including the amendments in the planning appeal. It is ludicrous to require objections to the amendments when there is nothing about the development of this site that is appropriate. The local roads as well as the major roads are a capacity already and it only takes one accident to bring everything for miles to a standstill. The public transport in the area is not adequate nor can it be made to be adequate. RHS Wisley is increasing its visitor attraction and the resulting increase in traffic has not been taken into account. I also object to the fact that the council doesn’t appear to be taking any of the objections previously lodged into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8324  Respondent: 11043809 / Andrea Moran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 Three farms meadows in the local plan.

The cumulative and accumulative damage that would be caused to all aspects of life in ockham and the local economy would be permanent severe adverse impact.

The community overwhelmingly wishes Three Farms Meadows to be added to the register of community assets in Guildford as identified in a recent questionnaire for the neighborhood plan.

the community in Ockham overwhelmingly and unanimously oppose development on Three Farms Meadows and believe that this local plan has got the Local Plan wrong for the parish of Ockham, wrong for the people of Lovelace, wrong for the villages in the east of the Borough, wrong for the Borough of Guildford, wrong for the neighboring boroughs and wrong for the strategic national assets hosted in the borough on behalf of the people of England, such as the A3, the M25 and the Metropolitan green belt.

I strenuously object to the Local Plan 2016.

Please read the attached document where I have fully outlined my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Accumulative and cumulative impacts object.doc (4.6 MB)

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Comment ID: PSLPS16/3326  Respondent: 11045761 / Sean Dowdeswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Development of over 2000 house village at Ockham (former Wisley Airfield). The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away would be enormous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/4390</th>
<th>Respondent: 11046561 / Michelle O'Dell</th>
<th>Agent:</th>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt, which provides sanctuary for many wildlife species. There is ample brownfield land in the urban areas which requires regeneration, without the need to encroach on protected Green Belt land. The election manifesto promises to the electorate are being ignored.

1. I object to the proposal to remove the Horsleys from the Green Belt. The so called "exceptional circumstances" required before taking this action have not been demonstrated. Estate development would overwhelm the area, and would not be in keeping with the character of this unique area. With regard to the proposed development at the allocated area A39 site would be unnecessary, as this would add to the already dense overdevelopment in the area, causing an urban "sprawl", affecting Horsley's picturesque image, also the proposed access road on Ockham Road North is inadequate, and would create traffic issues.

1. I object to the proposal to remove the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. This planning application has already been unanimously rejected by GBC’s Planning Committee, who cited the same concerns highlighted in this letter.

2. 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.

5. I object to the huge impact on transport, local roads, road safety and pollution. I especially object to:

* The assumption that the proposed developments will result in a shift from driving to cycling and walking. The FWA development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. There is also another assumption (and the taken for granted) that the other proposed developments nearer to Effingham Junction and Horsley stations will result in a reduction in car traffic. This will not be the case if people are required to travel regularly to areas around Guildford, Woking and the M25.

* The increased volume of car traffic. The proposed development in these areas would result in an estimated 4,000 additional cars on the roads.
* The danger this traffic will be to local cyclists and pedestrians, due to no cycling paths and the lack of pedestrian footpaths, and the space to provide them!

* The increased volume in car traffic will increase unnecessary pollution for residents.

6. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

7. I object to the fact that the proposed Local Plan which will affect the local communities has not been taken into consideration, 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.

1. I object to the impact the Local Plan will have on the already overstretched primary and secondary school places. The Raleigh School and The Howard of Effingham schools are already both at capacity. Surrey County Council has published no plans for creating further school places for children of all ages.

9. I object to the Local Plan not taking seriously the advice that Thames Water has given to Guildford Borough Council that the current wastewater network in this area is unlikely to be able to support the demand anticipated from all of these proposed developments. The foul drainage system all the way to the treatment works north of Ripley, will need to be upgraded to cope. There are serious concerns about these sites which have also been raised by a broad number of authoritative sources across the UK, including Highways England, NATS and the Environment Agency.

I am concerned about the proposed housing targets which has been allocated to Guildford Borough and the South East in general. I appreciate that new homes are needed, and that is the plan up and down the country, but the greenbelt is meant to provide a limitation on the inexorable growth of London. Keeping the greenbelt is so vital and beneficial for all, especially for future generations, to enjoy. I really hope that all brownfield sites take all priority in all areas, before the greenbelt is ever considered.

I trust that these objections will be fully considered and the Allocations at the Former Wisley Airfield, A35, A37, A38, A39, A40 and A41, are removed from the Guildford Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/3834</th>
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Having studied the submission plan, I find it is unsound due to the large number of errors in the plan due to the poor quality, considerable lack of transparency/ clarity in the evidence, and the inaccessibility of evidence for those who are not able to open the huge files being sent due to poor internet connections.

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for the reasons listed -:

1. It is the least sustainable strategic site identified in both this version and the previous versions of the plan because of the constraints on the site and the actual location.

2. It is further from railway stations than any other identified site.

3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

4. Local roads are already at capacity especially when there are roadworks, diversions etc on the SRN.

5. I object to the transport evidence including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable

6. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

7. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

8. Any public transport bus services provision to Horsley will hugely impact the safety of the local road network as the winding, partly unlit lanes are not wide enough to accommodate PSVs. The assumption that people will walk or cycle on a regular basis on these lanes is unsafe and unreasonable.

9. There is no evidence of sufficient employment available on the site, therefore almost all residents will have to travel to get to work.

10 The failure to address the impact of increased traffic does not address travelling to Woking rail station.

11. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

12. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

13. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

14. I object to the removal of additional 3.1 ha from the green belt without any justification

15. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

16. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

17. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

18. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

19. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

20. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
24. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

25. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I consider for all the reasons listed above that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4004  Respondent: 11047329 / Hazel Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. I object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7241  Respondent: 11047809 / Jeremy Frost  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to The Wisley Airfield Development still being in The Guildford Plan, as this was unanimously refused in 2016 by the planning committee and hence should not have been included. The impact this would have on the Horsleys would be immense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7261  Respondent: 11047809 / Jeremy Frost  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Wisley airfield site being put back into the plan, despite it being turned down by the planning committee recently. The detrimental effects it would have on the surrounding villages, such as the Horsleys would be huge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/299  Respondent: 11048289 / Susanna Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object without reservation to the GBC Local Plan in its entirety.

But first, I must comment that I think the cynicism displayed by the Council in turning down the Wisley Airfield development proposal and putting it back in the Local Plan the very next day shows a complete lack of integrity and destroys any faith one might have had in the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2924  Respondent: 11048289 / Susanna Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
3. 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 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.
4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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 proposed development of 2000+ houses and associated infrastructure, essentially a new small town, at Wisley Airfield, site A35. This is predominantly farmland, and the access would be onto an already gridlocked A3. Even the provision of a proposed new junction on the A3 at Garlick's Arch, if built (see above), being some distance south of the proposed development would be unlikely to alleviate the problem, however much the Council hopes it would. It seems clear the Council is running scared of the developers here. They are a nebulous company based in the Cayman Islands. They will however have the money to fight the refused planning permission. The Council clearly wants a reason to grant it. The problem again however, is that as indicated before, there is no clearly demonstrated need for homes for 5000 people at this location. Ockham, the nearest village, or more appropriately hamlet, is very pretty, indeed unspoilt. It would be utterly overwhelmed by this monster. Whilst this was the Vickers development airfield, the only parts of this that could be said to be industrial and are the runway and the hangers. The hangers are long gone, and the great majority of this site is productive, high quality farmland. Development here is utterly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3862  Respondent: 11049057 / Simon Boyden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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I object to the draft Local Plan for the following reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

Flooding across the country last winter clearly demonstrated the danger of overdevelopment and pressure on local drainage systems. I have concerns that building this number of homes, with much high density development, will lead to flood risk in the local area.

The proposed development in the Horsleys and the Three Farms Meadows (site A35 - the former Wisley Airfield) is unsustainable and will lead to environmental issues both at a local level and in adjoining areas downstream.

The huge scale of proposed development at A35 - Three Farms Meadow will have a huge impact on Ockham, the Horsleys and other surrounding communities. The scale of development will change the nature of these villages irrevocably, creating in effect a new town in a protected green belt area and overwhelming the local amenities, infrastructure and character. The draft Plan has failed to provide substantive evidence of a specific and defined need for large scale high density social housing in the local area.

In conclusion, I strongly object to its proposals as referred to above and believe that the proposed development would seriously detract from the very special character and nature of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4412  Respondent: 11053889 / Claire Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Finally, I STRONGLY OBJECT TO POLICY A35 (WISLEY AIRFIELD) this proposal should be rejected for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. There are no “exceptional circumstances” which can justify building on the Green Belt and destroying this area of natural beauty. The Council have sought to misrepresent the site as brownfield – but only 15% of it is developed. The proposals would irreparably damage the rural feel of Ockham and surrounding villages and lead to the creation of a small town – but with no opportunity for commensurate extension of infrastructure and development of necessary supporting facilities (or employment opportunities). This makes the proposals wholly unsustainable – without adequate provision for transport facilities, wastewater capacity and runoff, local schools, medical and other amenities, road capacity and flood prevention.

The development would create an isolated urban development but with none of the benefits of urban living and destroy the rural community. The proposed housing density is excessive when compared with existing development in the villages and the new developments would not blend with the existing developments.

The draft Plan fails to address the collective and hugely destructive impact of this site on a small part of the borough which lacks the infrastructure (particularly transport) to support it. It is disappointing to note that the total amount of new building is totally out of scale with the planned development elsewhere in the borough, especially less sensitive urban areas which are not protected by Green Belt.

The development is unsustainable for all of the reasons outlined above. Ockham is a beautiful, very rural village and the proposed development will utterly destroy the village which will be subsumed in a “new town” urban sprawl. The impact of this development on all neighbouring communities cannot be underestimated. The Council have failed to demonstrate any collective impact assessment on the surrounding area and communities.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I object to the proposed development of Wisley Airfield, particularly in the light of the recent decision by Guildford Borough Council to refuse the planning application. This should not have been included in the revised plan and provides further evidence that the entire plan is flawed and will cause massive destruction of the local environment. The impact on local villages particularly in regard to traffic in Ripley will be severe.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

Once again, there have been no exceptional circumstances presented for development on the Green Belt. Development of the site would contribute to the encroachment of the London urban area into the countryside. Additionally, the area is not a brown field site as stated, only 15% of it is brown field, and the majority of the land is agricultural land.

The development is close to the A3 and M25, and will contribute to unacceptable air pollution levels and an aggravation in traffic jams at A3 roundabout and M25 Junction 10. There is no existing public transport and so car transport will be required for everyone on the development with access either from the A3 via the junction with the M25 or from to inadequate narrow lanes. No proper traffic data has been provided.

The housing density is far too great, with over 2,000 houses that will swamp and destroy the Ockham conservation area.

The development would have a major impact on neighbouring villages, especially Horsleys. No assessment has been made of collective impact on area of this and 6 Horsley sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I have lived in Ockham now for 10 years, and have lost track of the number of letters I have had to write to you in objection to large scale development on this site. You seem hell-bent on ruining a part of the greenbelt, planting a totally unsustainable development on the Greenbelt and effectively eliminating the historic hamlet of Ockham. I am particularly distressed to see that since this proposal was last dismissed by the Planning committee, the land has now expanded and moved even closer to the residents along Ockham Lane (including our own house).

In summary then I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• 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.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1739  Respondent: 11069601 / Barry Kiddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object to Policy A35.

It could never satisfy Policy S1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4214  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy A35 – My Objections

79) The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land. The development does not meet the NPPF requirement, namely that developments that generate significant movement will be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The provision of slip roads at the A3/A247 junction to relieve the impact of this development on Ripley will have potentially severe effects on the A247.

80) My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4202  Respondent: 11071553 / Nicholas Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY A35 (WISLEY AIRFIELD) – I object. The Planning Committee has only recently rejected a planning application for an identical proposal, on 14 separate grounds. It was included in the plan just one day before this happened, showing that this policy is biased in favour of the applicants concerned. It may be no coincidence that these investors had already been given months of extra time to refine their planning application. It is probably also not a coincidence that they have close Conservative Party links with the council. This smells very bad.

The policy fails to present any “exceptional circumstances” for developing this site, which is 85% greenfield, not brownfield as often stated. Other objections include:

- The loss of good agricultural land.
- The excessive housing density involved.
- The fact that over 2,000 houses will swamp and wreck the Ockham conservation area, with harm to listed buildings.
- It disregards the conflict with SCC who also want to use the site for a waste facility.
- It is too near RHS Wisley and Thames Basin Heath SPA and will harm both.
- So will the proposed SANG, which is next to the SPA and would mean dogs and cats disturbing wildlife.
- There is no existing public transport and the train stations are miles away.
- To get there you have to use very narrow, flooded, unlit, winding country lanes with no footpaths or cycle ways.
- This would make the development dependent on private cars (about 3000-4000 of them). But there is no proper data for traffic volumes.

- The extra congestion will certainly make the traffic jams at the A3 roundabout and M25 Junction 10 even worse.

- There will be a dangerous increase in air pollution, as the Wisley Action Group have submitted.

- This is also clay land and the high groundwater table and poor surface drainage not considered either for site itself or for downstream areas in the River Mole basin, which already flood.

- The policy does not consider the major impact on neighbouring villages, especially Horsleys where hundreds of new houses are also proposed. The aggregate impact on infrastructure is not assessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6298  **Respondent:** 11077473 / Helen Austin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*  

Wisley Airfield

The proposal for 2000 houses proposed for Wisley Airfield site has been refused by the Planning Committee 2016. This proposal remains on the Guildford plan. The removal of more Green Belt in order to build is a huge concern. The increased use of highways together with the problems of the infrastructure within Horsley not being capable of withstanding the increased numbers this would inevitably be a worrying threat in both the short and the long term.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6438  **Respondent:** 11078337 / Giselle Hampton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*  

The very fact that the Plan has identified major highway improvement requirements and the necessity of a significant public transport bus service on wholly inadequate rural roads indicates the complete impracticality of this proposal. The infrastructure works that will occur as a result of the Wisley airfield site development indicate the disruptive and inappropriate nature of this proposal.

The A3/M25 section of highway is already heavily congested at peak times. The increased traffic levels arising from the proposed development would be intolerable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/6443  Respondent: 11078337 / Giselle Hampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are adamantly opposed to this proposal. The creation of what is effectively a new town in the middle of the Green Belt close to existing heathland and extensive open space is completely contrary to everything that the Green Belt stands for. The scale of the proposed project is massively disproportionate and as already pointed out will place severe burdens on road infrastructure.

The inevitable traffic increase will completely change the nature and character of Ockham village. It will also impose create excessive demands on the nearby stations of Horsley and Effingham Junctions where car parking is already under pressure and where car access is not straightforward. Other local resources such as schools and local health services will also inevitably come under pressure from such a sizable development. It is also worth mentioning that constant reference to the site as being a former airfield seems to seek to imply that any development is taking place on previously developed land. As any visitor to the site will appreciate this site remains primarily agricultural.

It is only the concrete runway, which should have been torn up on closure of the site as an operating airfield after a short period of use, which hints at any form of previous development. The developers constantly overplay this idea of the land being previously developed and it unfortunate that the draft plan does not call out the primarily greenfield and agricultural nature of the site.

We would like to take this opportunity to register our support for the Wisley Action Group's stance on this development and would entreat the Borough to reconsider this aspect of the draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1392  Respondent: 11086433 / Colin Carmichael  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7271  Respondent: 11086433 / Colin Carmichael  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Development of over 2,000 houses at Ockham (Wisley Airfield) under two miles away: the impact of such a huge development on the Horsleys will be huge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1445  Respondent: 11086529 / Sue Carmichael  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I have lived in West and East Horsley since 1984 and object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. 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.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

5. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

6. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2432  Respondent: 11086529 / Sue Carmichael  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have the following objections to the proposed development at Three Farms Meadows, Wisley, and to the Guildford Borough Council Local Plan. Please confirm that all of these comments together with all my previous comments have been passed to the Inspector.

1. I object to the inclusion of Three Farms Meadows in the draft Local Plan for a number of reasons including:
   - It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
   - It is further from railway stations than any other identified strategic site.
   - It is close to one the most congested junction in the country (M25 Junction 10).
   - Local roads are at capacity particularly when the SRN is not free-flowing.
   - Any public transport (bus) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs.
   - It is adjacent to the most popular visitor attraction in the south-east, RHS Wisley, where visitor numbers are increasing every year.
   - There is insufficient employment available locally so that almost all residents will have to travel to work.

2. I object that the increased area, being on the south of the site facing the Surrey Hills AONB, will increase the negative impact of the views from the AONB.

3. I object to the removal of additional 3.1 ha from the green belt without any justification.

4. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

5. I object to the fact that the Council has failed to remove this site from the local plan despite thousands of objections from local residents and statutory consultees.

6. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

7. I object to the extension of the plan period by one year as it has not been identified as a major change.

8. I object to the inclusion of a 10% buffer in the housing number over the plan period as unnecessary.

9. I object to the housing number and I believe that the housing number is poorly based and open to legal challenge.

10. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development.

I object to the Council wasting the time and money of tax payers and local residents by not following due process and ignoring previous representations. I consider, for the reasons listed above, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in the local area, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

6) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I also object to the Local Plan proposals for any significant increase in the population of the Horsleys, Ockham, Ripley and Send. Notwithstanding the effect of proposed development in these villages the provision of over 2,000 homes on the Former Wisley Airfield will add some 5,000 to 6,000 people to the area and probably 3,000 or more extra vehicles. This new community will need to get to their workplaces and schools and as there is no train station proposed for Wisley Airfield they will have to travel by car either by driving to Guildford or London or to the train stations at Horsley and Cobham. This will involve them accessing the A3 where the 3,000 vehicles would first have to go south to the Ripley/Ockham junction before going east to Horsley Station or north to London and Cobham.

At the present time at rush hour there are often queues northbound between the Ripley/Ockham roundabout and the Cobham roundabout and the addition of a further 3,000 vehicles at this time would cause these roundabouts to seize up and effectively close the A3. Those motorists lucky enough to complete their journeys via the A3 will find that there will not be any spare car parking at either of the stations (where there is no room to extend either the car parking or the platforms) and even if by chance they did find a space in the car park they probably would not find one on the train.

In the villages most of the primary foul water, surface water, electricity, gas, and telephone services are 80 or more years old, close to capacity and near to the end of their effective life. My personal experience of this is that in the six years that I have lived in Ockham Road South East Horsley the electrical supply to my part of the road has failed twice, once for five days and the second time for two days due as the electricity supplier told me, to the age and capacity of the mains cables.

Although new energy saving technologies and elements like sustainable underground drainage systems can to a degree reduce the impact of any new developments ultimately they still have to be provided with services form the existing primary utilities infrastructure which will not be able to cope or be renewed by the monies obtained from the anticipated community infrastructure levies.

Other resources which will be overwhelmed will of course be the local healthcare services (where appointments are already difficult to get) and many will be aware of the near impossibility of parking at Royal Surrey County Hospital. It is also the case that most of the local “country” roads already have difficulty in withstanding the onslaught of potholes following each winter, without the added attrition of 100’s of heavy good vehicles which will be unleashed when any significant development works start.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A35 Wisley. I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. However, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the changed Policy A35 Wisley

- The two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.
- My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. This is disgraceful!
- There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4159  Respondent: 11104033 / David Dutton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land. The development does not meet the NPPF requirement, namely that developments that generate significant movement will be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The provision of slip roads at the A3/A247 junction to relieve the impact of this development on Ripley will have potentially severe effects on the A247.
- My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.
- The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The allocation of Wisley Airfield for housing is an issue for the Borough Council to determine. However, the RHS does object to the allocation of a 16.98 hectare waste use in the north-west corner of the site as identified within the Surrey Waste Plan (2008). RHS Wisley is internationally renowned and contains rare collections of plants, some of which are extremely sensitive to environmental change. Biological aerosols created by the waste material will be carried in the air and will have a significant detrimental impact on the sensitive ecosystem at Wisley. RHS Wisley is strongly opposed to the provision of a waste facility within such close proximity to the Gardens.

In relation to a new settlement at the Wisley Airfield site, the RHS is cautious of the impact of the proposed increase in traffic movements, pollution to air and groundwater supplies, and development on the Ripley roundabout. In view of the emerging Wisley Masterplan the RHS encourages a thorough assessment of the impacts on existing uses, the highway network and that all impacts are mitigated.

Finally, the RHS is encouraged by the sustainable transport requirements including a significant bus network, detailed in Policy A35 which will help to mitigate impacts on the existing highway network.

Conclusions

In principle, the RHS is largely in support of the policies proposed within the Guildford Borough Proposed Submission Local Plan: Strategy and Sites, July 2016 document, aside from the comments raised above.

In the context of the importance of RHS Wisley to horticulture, science, education, communities, health and the local economy, we hope that the Council will recognise the benefits of greater flexibility by removing the village and garden from the Green Belt.

The RHS consider this to be a positive recommendation which will help to meet the aims and objectives detailed in the Local Plan whilst aiding the continued development of the Garden and the value it brings to the Borough. We therefore trust that the Council will accept our representations.

Please can you ensure that our details are recorded on the database for future consultation. We also take this opportunity to continue to reserve our ability to appear at the Examination in Public of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<See attachments>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: RHS WisleyInset.pdf (58 KB)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The allocation of Wisley Airfield for housing is an issue for the Borough Council to determine. It is noted that this allocation has increased in size from 93 ha to 96 ha with the inclusion of a further parcel of land. The RHS welcomes the inclusion of mitigation schemes to address issues on rural roads surrounding the site and the requirement for development to have sensitive design at site boundaries that has significant regard to the transition from village to greenfield.

However, the RHS continues to object to the allocation of a 16.98 hectare waste use in the north-west corner of the site as identified within the Surrey Waste Plan (2008) and allowed through appeal reference APP/B3600/A/09/2098568 on 8 March 2010. Here it is important to note that this consent has now lapsed and has not been implemented. RHS Wisley is internationally renowned and contains rare collections of plants, some of which are extremely sensitive to environmental change. Biological aerosols created by the waste material will be carried in the air and will have a significant detrimental impact on the sensitive ecosystem at Wisley. RHS Wisley is strongly opposed to the provision of a waste facility within such close proximity to the Gardens.

Our previous comments remain on the impact of proposed increase in traffic movements, pollution to air and groundwater supplies, and recent information arising from the impending Appeal hearing give greater concern that these environmental issues will affect the garden.

Conclusions

In principle, the RHS is largely in support of the policies proposed within the Guildford Borough Proposed Submission Local Plan: strategy and sites 2017 / Policy A35 document, aside from the comments raised above.

In the context of the importance of RHS Wisley to horticulture, science, education, communities, health and the local economy, we hope that the Council will recognise the benefits of greater flexibility by removing the village and garden from the Green Belt, given its established nature.

As a Grade II* Registered Park and Garden and an internationally significant scientific collection Wisley garden is at threat from environmental change including local developments that affect the air, temperature, groundwater, and soil conditions, alongside visual impact and noise. The Society seeks protection of this garden, which is of global horticultural scientific importance, with appropriate mitigations from planned developments that affect it and its future.

Furthermore the Society seeks specific recognition in the Plan of its site and the activities that take place at Wisley to the benefit of Guildford Borough Council, and through co-operation, Woking Borough Council.

The RHS consider this to be a positive recommendation which will help to meet the aims and objectives detailed in the Local Plan whilst aiding the continued development of the Garden and the value it brings to the Borough. We therefore trust that the Council will accept our representations.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Appendix_2__GBC_Local_Plan_Nov_2013.pdf (74 KB)  
- Appendix_1__GBC_Local_Plan_June_2016__RHS_Wisley_Representations1.pdf (413 KB)

Comment ID: PSLPS16/5743  
Respondent: 11168161 / Judith Robertson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My objections are as follows:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I strongly object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- The Council has allowed many existing houses, which would be ideal for first time buyers and those with families, to be turned into houses of multiple occupation, in order to house students, who make no contribution to Council Tax, and who are a wholly transient population. The University should be made to house their students in Halls of Residence within the purview of its own considerable land holdings, thereby releasing much needed housing stock.

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. **Guildford BC has foolishly encouraged the influx of a large and increasing number of “leisure” cyclists into the Horsleys, who block the roads every day of the week, hold up traffic (increasing air pollution) and impede residents from efficiently going about their everyday business.**

   - I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   - I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   - 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.
   - I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3736  **Respondent:** 11168161 / Judith Robertson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.

12. Opportunity (3) should be common to all sites and is not unique to this site.

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

16. I object to the removal of additional 3.1 ha from the green belt without any justification.

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

Additionally, the Council has failed to ensure that Surrey University needs to provide student accommodation on its own land, rather than losing valuable, appropriately situated housing stock for Homes of Multiple Occupation, which are the temporary residences of a transient population of students who have no commitment to the communities in which they live, and who make demands on Council services whilst not paying any Council Tax.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6349  Respondent: 11170273 / T Green  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am a West Horsley resident and lived here for over 32 years.

I very strongly object to policy 52’s proposal on the development of housing in what is deemed ‘Green belt land’

Sir Eric Pickles stated that the imposition of such developments on Green Belt should only be implemented in ‘exceptional circumstances’. The ONS/DCLG figures in para 158 show the proposed increase as well above the agreed target. The area of the ‘Horsleys’ is recognised as Metropolitan Green Belt, incorporating Areas of Outstanding Beauty.

The proposal to build 2000 dwellings will deeply affect:

1 Roads and lanes around the surrounding area within a 5-mile radius which are already badly maintained and not fit for purpose. This increase will exacerbate the problem.

2 Drainage problems which already exist in what is ancient infrastructure and these dwellings can only increase the problem.

3 School places which are already at a premium.

4 The Medical Centre in Horsley which is at capacity as other medical centres including Effingham have shut. The increasing number of elderly and infirm people is putting further pressure on this facility.

5 The railway stations serving this area which have no further capacity to increase car parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7303  Respondent: 11182849 / Ian Featherstone  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
We act for Crimson Project Management. This representation relates to the TABLE 1- Policy S2 and Policy A35 concerning LAND AT FORMER WISLEY AIR FIELD, OCKHAM.

The proposed allocation of land at Wisley for a new settlement would be incompatible with the Council's decision to refuse planning permission for this new settlement on grounds which, inter alia, seemingly go to the principle of building a new settlement at this location.

The proposed settlement is in an unsustainable location having regard to its geographical relationship to any district or local centres or other significant areas of population and is in an unsustainable location in respect of public transport access. Its location would appear to be dependent upon its relationship to the adjacent motorway and strategic road network which undoubtedly will provide the stimulus for encouraging travel by the private car on already busy roads.

There are more sustainable locations for new housing development in the Borough than Wisley airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

![TABLE 1 POLICY S2 & A35_20160715133228.pdf](65 KB)
PROPOSED SUBMISSION LOCAL PLAN - CONSULTATION REPRESENTATIONS

I am pleased to herewith submit representations to the ‘Guildford Proposed Submission Local Plan: Strategy and Sites’ consultation, ahead of the consultation deadline of 11:59 Monday 18 July 2016. CBRE Ltd acts on behalf of Julian Harris and Nicola Harris, the legal owners of c.14.5 hectares (36 acres – plan attached) of land and buildings known as Land at Bridge End Farm, Ockham, which is promoted through this consultation and these representations.

This letter sets out the background to ownership of the land promoted through this consultation and the representations themselves.

Land at Bridge End Farm

Julian Harris and Nicola Harris (“our Client”) are the owners of freehold land known as Land at Bridge End Farm, Ockham GU23 6NU. The extent of the ownership and land the subject of these representations is outlined in red on the attached plan.

Our Client acquired the Land at Bridge End Farm from their father, Jessel Harris on 27th December 2002. Jessel Harris retains ownership of Bridge End Farm house and lives there today.

Land at Bridge End Farm comprises agricultural land extending to approximately 14.5 hectares (36 acres) in size. The site is made up of a number of agricultural fields and numerous farm buildings and associated hard standing. Access is provided by Hatch Lane off Ockham Lane. Bridge End Farm Land has been run as a cattle farm by a local farmer since 1984.

Previous Promotion

Land at Bridge End Farm has historically been promoted through the Local Plan process in conjunction with other surrounding land, for a strategic allocation at the former Wisley Airfield. This larger land parcel has been assessed by GBC and was considered suitable for release from the Green Belt and allocation as a new urban settlement, through the evidence base for the emerging Local Plan.

Land at Bridge End Farm was originally included within a previous draft Local Plan Strategy and Sites document, but did not feature within the Local Plan Strategy and Sites consultation draft (July 2014). This was partly because Jessel Harris, in response to a letter sent to him by GBC, stated that the Bridge End Farm Land was not available. The reduction in size of the allocation, arising from the exclusion of the Bridge End Farm Land and other neighbouring land, resulted in the potential residential yield of the allocation being reduced from 2,500 units to 2,100 units.

Representations were submitted to the July 2014 consultation, reiterating that Land at Bridge End Farm is available to be included within the Local Plan and that Our Client is promoting the land for inclusion within the wider land parcel, which is crucial for the success of the strategic allocation and development proposals.

At that time, the representations focused on the need for the strategic allocation to achieve a critical mass in relation to size and scale of development, being informed by GBC’s Green Belt and Countryside Study (Volume V April 2014), which forms part of the evidence base for the emerging Local Plan.

Representations

Our Client supports the principle of the strategic allocation around the former Wisley Airfield site, including Land at Bridge End Farm, for the creation of a new settlement. However, it is considered that the draft policy associated with the allocation should be altered to more closely reflect GBC’s supporting evidence based and take advantage of the potential development opportunity in this location. Detailed representations in this regard are provided below.

Context

The National Planning Policy Framework (‘NPPF’) sets out the tests against which Local Plans should be prepared and assessed. Local Plan policies should follow the approach of the presumption in favour of sustainable development.
The principal test guiding policy adoption is that of ‘soundness’, namely that the plan should be (NPPF paragraph 182):

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

It is against these categories that the draft Local Plan has been reviewed and against which the following representations have been made.

Site Allocation A35: Land at Former Wisley Airfield, Ockham

The Site Allocation within the Proposed Submission Local Plan now includes a wider area than in the previous draft Local Plan, with associated Policy A35 identifying approximately 2,000 homes to be brought forward along with other employment, retail and leisure uses and supporting infrastructure. The larger allocation reflects previous representations made by Our Client and other landowners bringing forward available and deliverable sites. As highlighted above, Our Client is supportive of the principles of the now expanded allocation for a new settlement in this location. This more closely reflects the scale of land identified and assessed within the supporting evidence base for the Local Plan. However, there are additional comments Our Client would like to make, with several factors to consider, taken in turn below.

Green Belt and Countryside Study

In February 2013, Pegasus Planning Group published a Green Belt and Countryside Study on behalf of GBC, which was later updated with the addition of Volume V in April 2014. This study concludes that land parcel C18 (former Wisley Airfield site and Land at Bridge End Farm) represents an appropriate location for a new settlement and is of a size, and capable of a potential yield, to support a sustainable development in this location.

The Green Belt and Countryside Study identifies a population yield greater than 4,000 people as being capable of comprising a sustainable settlement. Therefore a population of 4,000 is not a ceiling or target, but represents an estimated minimum to assist in creating a sustainable settlement.

Wisley Airfield Outline Planning Application

Outline planning permission for development of a new settlement at the site of the former Wisley Airfield was refused by GBC on 8 April 2016. Refusal was predominantly on the grounds of inability to demonstrate very special circumstances to outweigh harm to the Green Belt, a policy test which will not apply should the proposed allocation in the emerging Local Plan be adopted.

This planning application sought permission for up to 2,068 residential dwellings, up to 100 sheltered accommodation units, retail, leisure and commercial uses as well as other supporting infrastructure. It is clear from the description of proposed uses at Policy 35 of the Proposed Submission Local Plan, that this has been largely informed by the scope of the outline planning application at the former Wisley Airfield site, despite the allocated land being larger than that of the outline planning application site.

Green Belt Boundary

The draft Policies Map accompanying the Proposed Submission Local Plan, proposes a number of alterations to the Green Belt boundary. In relation to the proposed site allocation A35, the Green Belt boundary revisions result in a larger
area than the allocation being released from the Green Belt. The justification behind this is to utilise physical and permanent features to create a defensible Green Belt boundary, not including land within the Green Belt which it is unnecessary to keep permanently open, and to endure beyond the plan period. This approach reflects policy within the NPPF at paragraph 85 and Our Client is supportive of this approach, recognising appropriate Green Belt boundaries and the possibility for additional land to come forward for development to meet future development needs.

**Commentary**

In Our Client’s view, the above identified key considerations would suggest that draft Policy A35 as currently worded, does not accurately reflect provisions of the NPPF and the opportunity for sustainable development. Our Client suggests that greater flexibility is introduced to draft Policy A35 to allow for a more significant contribution of development, particularly in relation to residential dwellings, with specific reference to a higher number. The justification for this, as above, can be summarised as follows:

- The supporting evidence base for the emerging Local Plan indicates a minimum population yield that could be capable of creating a sustainable settlement in this location and focus should be for a yield in excess of this, with a larger development capable of delivering more social and community infrastructure and benefits supporting a sustainable development;

- It is inappropriate for the specifics of the allocation to be informed by the outline planning application at the former Wisley Airfield site, which relates to a significantly smaller land at The inclusion of Land at Bridge End Farm, as well as other land, in the allocation provides the opportunity to enhance the development of a new settlement here and allows for a greater scale of development at appropriate densities, assisting in producing a higher population yield reflecting the supporting evidence base and enabling the creation of a sustainable settlement;

- Although not able to be specified in the allocation due to lack of its promotion, the additional land to be released from the Green Belt by virtue of the proposed Green Belt boundary should be recognised as providing for future development need Draft Policy A35 should therefore include recognition of this and be informed by the proposed defensible boundary and future development potential.

In addition to the above, planning for sustainable development is enshrined within the NPPF, as well as a requirement to “boost significantly the supply of housing” at paragraph 47.

For the reasons set out above, Our Client considers that Policy A35 of the Proposed Submission Local Plan as currently drafted is unsound, as it is not:

- ‘Positively prepared’ – Additional development brought through the strategic allocation would further assist in meeting the development needs of GBC and neighbouring authorities. The development potential has not been maximised with additional land being promoted;

- ‘Justified’ – As it is not the most appropriate strategy with consideration to the principles of the evidence base and inappropriate reliance on the scope of the outline planning application; and

- ‘Consistent with National Policy’ – As it could do more to boost the supply of housing and promote sustainable development.

**Conclusion**

The increase in size of the Wisley Airfield allocation following the inclusion of the Land at Bridge End Farm and other neighbouring land has provided the Local Authority with the potential to provide new sustainable mixed- use development.

We do not believe the Local Authority has positively addressed the additional land and would challenge that the 2,000 units as set out in policy A35 is sufficient. Page 124 of the proposed submission plan refers to an ‘approximate 2,000’ homes and this still does not reflect the original Pegasus report 2013 whereby 2,500 homes were deemed appropriate and indeed desired to create a sustainable community.
In order to be found sound, we request that the Local Authority amend Policy A35 to state that the site can accommodate approximately 2,500 homes. The exact number can then be determined through proper masterplanning of the site.

I trust that the above provides informative comments to the current consultation. I would be grateful if you could please confirm safe receipt of these representation and for above comments to be considered and included in the submission of the draft Local Plan.

In addition, we request to be kept informed on the Examination proceedings and request to reserve the ability to take part in the Examination Hearings on behalf of our client.

Please do not hesitate to contact me or my colleague Mark Novelle (020 7182 2423) should you wish to discuss any of the above further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Pages from Bridge End Farm - Submission Local Plan Reps Letter.pdf (160 KB)

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7850</th>
<th>Respondent:</th>
<th>11458241 / Bewley Homes</th>
<th>Agent:</th>
<th>Bewley Homes Plc (David Neame)</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
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</tbody>
</table>

Policy A35 – OBJECT: UNSOUND – Not Positively Prepared, Justified, Effective or Consistent with National Policy:

The Council’s proposed allocation of land at former Wisley airfield, Ockham cannot be considered as a sound land release for the following primary reasons:

- Development Scale and Sustainability: The Council suggests that this proposal will create a new settlement (see Spatial Vision) yet the residential component only comprises 2,000 dwellings. A development of 2,000 dwellings is insufficient in terms of its scale to provide a large enough population to sustain the new services and facilities that would need to be provided alongside housing and employment.
- It has been long established in the planning system that the creation of new settlements requires a nucleus of population of sufficient size to ensure that the associated services and facilities can be funded and provided and then maintained in a viable manner.
- Many examples exist of new settlement development and all of those that have succeeded require greater levels of housing than the Council is currently proposing.
- Although a little dated now in terms of its publication date the Town and Country Planning Association ("TCPA") produced a document in 2007 in conjunction with the DCLG that reviewed Best Practice in relation to Sustainable Urban Extensions and New Settlements.
- The review reached a number of key conclusions those of direct relevance to the Council’s proposal are summarised below:
  - The decision making in relation to the provision of a new settlement is not something that can or should be taken at a local authority level. The strategic nature of such a decision renders it necessary to consider at a more strategic level to ensure that cross boundary issues with neighbouring authorities are properly considered and catered for;
  - New settlements have a long lead in time that is typically 20 years i.e. the whole plan period; and,
  - Significant initial investment is usually required to bring forward the substantial infrastructure that is typically required.
- The Council is therefore proposing a new settlement unilaterally at a local level and without proper recourse to neighbouring authorities (Neame Sutton is aware of a number of authorities that border Guildford Borough that are objecting to this proposal).
• The Council is suggesting that the 2,000 dwellings on the site will be delivered in years 1 -15 (Table 1 refers) yet typical delivery from such proposals is 20 years.
• The scale of the proposal is too low to ensure the necessary infrastructure requirements can be bought forward in a viable manner.
• For these reasons the draft allocation proposal is inadequate in scale and inherently unsustainable.

**Delivery of Essential Infrastructure:**

• The Council identifies in the policy that ‘interventions will be required to address potential highway performance issues.’ Furthermore the Council states that regard will need to be had to the delivery and timing of key infrastructure.
• Appendix C of the Plan sets out the key infrastructure required to deliver the Plan as a whole and in specific relation to Wisley confirms the following requirements:

<table>
<thead>
<tr>
<th>Infrastructure Required</th>
<th>Cost to Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improvement works to the strategic road network (SRN1, SRN2, SRN3)</td>
<td>A proportion of the following: SRN1 - £2m SRN2 - £100 - £250m SRN3 - £100 - £250m</td>
</tr>
<tr>
<td>Improvement works to the local road network (LRN7)</td>
<td>£25m</td>
</tr>
<tr>
<td>Bus interchange</td>
<td>£0.25m</td>
</tr>
<tr>
<td>Significant bus network</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>Off site cycle network</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>Upgrades to water supply network</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>Upgrades to foul sewer network</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>Flood risk and compensation works</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>A new two form entry primary school</td>
<td>Land plus significant proportion of £8m cost</td>
</tr>
<tr>
<td>A new four form entry secondary school</td>
<td>Land plus significant proportion of £15m cost</td>
</tr>
<tr>
<td>Delivery of Bespoke SANG</td>
<td>To be confirmed</td>
</tr>
<tr>
<td>Neighbourhood Policing Centre</td>
<td>£100k</td>
</tr>
</tbody>
</table>

• Even taking into account those items where the Council has attributed a cost it is apparent that a development of some 2,000 dwellings cannot afford to deliver all of the infrastructure that the Council state is required to make it acceptable in planning terms as a sustainable new settlement. The fact that the Council has not been able to quantify the majority of the works that are required also represents a failing in terms of demonstrating that the Plan will be effective in the delivery of those obligations.
• It is therefore hard to see how a scheme of 2,000 dwellings will ever come forward on the land let alone within the 20 year time horizon of the Plan that has in effect only 17 years left to run.

**Planning History:**

• The Council has recently determined an Outline Application on the site for circa 2,000 dwellings, which was refused permission on 08 April 2016 (Decision Notice attached at Annex 1).
• The decision notice confirms the following concerns raised by the Council’s Planning Committee:
  ◦ The scale of development would have a clear and substantial detrimental impact on the openness of the Green Belt;
- No evidence to demonstrate the scheme would not give rise to severe adverse impact on the safe and efficient operation of the strategic road network;
- Impact on the viability of existing district and local centres in the vicinity;
- Impact on safeguarded waste site;
- The quantum and scale of development is unacceptable;
- Impact on listed buildings;
- Impact on air quality; and,
- A range of matters relating to Planning Obligations.

- It is clear from the decision that the Council’s own Members share the same concerns as Bewley in relation to the viability and deliverability of the development in this location together with raising additional concerns in relation to its impact on the Green Belt and the character of the area.
- If this is the view of Council Members it seems perverse that the Council has continued with the proposed allocation of the land given that the delivery of circa 2,000 dwellings has been tested more thoroughly through the planning application process and found to be significantly lacking.

Furthermore, and as document in the SA (Page 20 of the main SA document refers) neighbouring Local Planning Authorities have also raised serious concerns in relation to the proposed allocation of this site in the Plan. In particular Elmbridge Borough Council has highlighted the vulnerability of the Green Belt in this location as confirmed by the Inspector appointed to examine the Elmbridge Core Strategy.

The Council’s proposed allocation should therefore be deleted and further land allocated to make up the shortfall in supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5173  Respondent: 11458241 / Bewley Homes  Agent: Neame Sutton Limited (David Neame)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy A35 – OBJECT: UNSOUND – Not Positively Prepared, Justified, Effective or Consistent with National Policy:

2.79 Given that this Regulation 19 consultation is targeted on the amendments made by the Council Bewley has reviewed the amendments to this policy and all of its concerns as set out in its representations from June 2016 remain unresolved.

3.0 Representations in Relation to the Sustainability Appraisal (“SA”)

3.1 On the basis that there is direct overlap between the representations set out in Section 2 above and the SA the comments in this section are limited to Bewley Homes’ specific concerns with the updated SA.

3.2 The SA confirms on pages 26 and 27 that there is an unmet need in the HMA arising from working amounting to 3,150 dwellings. Box 6.8 even confirms the Council’s understanding that ‘there is little reason to suggest that the Waverley Local Plan will provide for any of Woking’s unmet needs.’

3.3 The SA then accepts the need to consider options that meet some or all of Woking’s unmet need, which must be the right approach to take.

3.4 This is of course, for the reasons set out in Section 2 above, completely at odds with the actual approach taken by the Council in the Plan that singularly ignores the unmet need arising from Woking.
3.5 The SA and the Plan are therefore in direct conflict with one another over this important matter, which cannot be considered to meet with the tests of soundness particularly in terms of being justified, positively prepared or in accordance with National policy and guidance.

3.6 Table 7.1 on Page 39 summarises the options the Council has considered and identifies at Option 8 and OAN plus 27% uplift scenario. This option is the closest in terms of alignment with the correct OAN identified in Section 2 of these representations.

3.7 Option 8 confirms the best outcomes in terms of economy and housing, which confirms the suitability of this option to address the needs of the Borough in terms of meeting housing need and sustaining the local economy. The areas where harm is identified in the table relating to Landscape, Transport and, Biodiversity are all matters that are capable of mitigation bought about through the Development Management process and should not therefore be viewed as overriding factors against pursuing Option 8.

3.8 Finally Option 8 scores poorly in relation to the ‘land’ category, which is perhaps of no real surprise given that land is a finite resource and the development of an increase level of housing necessarily results in the use of more land. This is more a function of Option 8 rather than an expression of its sustainability credentials.

3.9 The SA does not therefore identify any specific or indeed cumulative overriding issue that would render Option 8 unviable or unsustainable. Instead the SA confirms the view that Option 8 is the best in terms of addressing the significant housing shortfall in the Borough and ensuring the longevity and growth of the local economy.

3.10 In fact the final bullet point of Paragraph 6.5.26 on Page 35 confirms that Option 8 is both reasonable and would meet half of Woking’s unmet need. This is entirely in line with the approach set out by Bewley Homes in Section 2 of these representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1187  Respondent: 11556161 / Barry Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley, I would support the proposed development at Wisley Airfield, this seems to be the creation of a sustainable and self-contained community which could have good road links on what is arguably a "brown-field site". I support the Wisley proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1111  Respondent: 11847233 / Wisley Property Investments Ltd (Mike Murray)  Agent: Savills (Charles Collins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )
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: pslp172/2710  Respondent: 11847233 / Wisley Property Investments Ltd (Mike Murray)
Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Please see the attached representation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Reg 19 GBLP Representations Wisley Property Investments July 2017.pdf] (17.6 MB)

Comment ID: PSLPS16/5936  Respondent: 12210849 / Jason Doran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I don’t object to the building of houses over the Wisley airfield, provided they get their own junction onto the M25 and not onto the A3 which is already too busy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5698  Respondent: 13596353 / MARK WORSFOLD  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for the following key reasons:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. Delisting of land in this way makes a mockery of the Green Belt and any environmental and planning legislation or regulation.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). Specifically there are a large number of Red Listed species that either use this site or are the adjacent farmland. All will be affected by this development proposal. For example, there are significant numbers of Northern Lapwings that are either resident (nesting) or migrating through this site each year.

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- And I most strongly object to the continual destruction of this ‘green and pleasant land’ for short term pecuniary gain. We live on an increasingly overcrowded island and are reliant on imports for most of our foodstuffs. In the long term this is unsustainable and the proposed Local Plan will only exacerbate this dire situation. Building over good, crop-growing farmland is not only absurd but ill-advised given this pertinent fact.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3303  **Respondent:** 15063745 / John Pryce  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )**

I object to the development of the A35 Wisley Airfield site - also in the Green Belt. The idea of building 2000 homes would completely change the area and is totally inappropriate, particularly as this plan has already been previously rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2213  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )**

I object to the development of the A35 Wisley Airfield site - also in the Green Belt. The idea of building 2000 homes would completely change the area and is totally inappropriate, particularly as this plan has already been previously rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
40.1 I object to Policy A35 Wisley

40.2 I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

40.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

40.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

40.5 Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2237  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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 changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley.

1.2 My previous objections therefore still stand for this changed policy concerning the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

1.3 There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

1.4 This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

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2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
10. Cost of infrastructure required to the detriment of alternative more favourable sites.
11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
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15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/3529  **Respondent:** 15104897 / Terence Waters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy A35 for the following reasons:

1. The sheer size and density of the development is quite out of proportion to the local area. Horsley has several hundred less houses and occupies an area of around six times as great.

1. The housing in the development will, inevitably, be completely out of character with the surrounding village. These have been around for hundreds of years and grown organically. New houses have tended to be built singularly or small multiple units and therefore, over time, have fitted in - but a new 2,000-house estate in this setting is, frankly, a ridiculous suggestion.

1. The local roads are unable to cope with the existing traffic. Ockham Road North and South are narrow and windy, with only one pavement in some places which is often just 2-foot wide and which at times vehicles need to mount for large vehicles to pass in the opposite direction. The additional traffic generated by the new development will exacerbate an already intolerably dangerous situation.

1. The transport requirements of residents of the new development can only be met primarily by private cars and the existing train stations of Horsley and Effingham Junction. The junction between the Ripley roundabout and
the A3 heading northbound is already crowded with cars during the rush hour - adding more cars with lengthen the delays currently faced. And is it sensible to have a development built so close to the A3 with all the emissions generated currently to which greater delays will only add? The car parks at the two stations are already close to capacity - last winter when I went to Horsley Station at 10.00am there were only six available spaces. Where I live, about a mile from the station, there is a layby next to the side of my property which is used by the customers of the local butcher. Connisbees and I already see cars parked there all day with the owners walking down to the station. If the car park becomes full, so will the layby and then we'll have cars parking on Ockham Road itself creating even more traffic problems.

1. The additional population created by the development is likely to be between 5-6,000 including perhaps 6-800 children of school age. There are not the medical or educational facilities available to cope with this sudden influx.

1. And perhaps most important of all the plan contravenes the Green Belt regulations in that the requirement for the development does not meet the "special circumstances" set out.

For all these reasons I object to Policy A35 and trust the Council will remove the Wisley Airfield site from the local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15107297 / Ian McQuattie</th>
<th>Agent:</th>
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I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.
<table>
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<tr>
<th>Comment ID: PSLPS16/112</th>
<th>Respondent: 15107937 / Ken Harding</th>
<th>Agent:</th>
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<th>Comment ID: PSLPS16/1367</th>
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<th>Agent:</th>
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</table>
Please can we crack on with the plans to add 2000 houses at Wisley and the 500 houses in Horsley? Accommodation is desperately needed and you must ignore all these bleats about greenbelt (Horsley is built in the greenbelt thanks to some far sighted people in the 40's and 50's).

It is time for someone to make a decision to get the houses built. The proposed plan is a start but only building 30 new houses per year is simply insufficient.

All the Neighbourhood Plan people in this village seem to be involved only to try and stop any development.

Please approve and get started

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

My view is that the plan is too conservative. There is ample room in the Horsley's - where I live - and the surrounding villages for many more houses. GBC must not allow itself to be intimidated by well connected and well funded NIMBIES.

the fact is that all of the villages have been developed within the green belt - whatever that is - and can be significantly enlarged without any impact on the nature of the area.

Wisley development is desperately needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
(2) I object to the Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon) sites being used for housing development as the nearby villages simply cannot support the increase in traffic.

(3) There is already a very high level of traffic congestion in Ripley high St, sometimes gridlocked at rush hour already making access to services and residences in ripley very difficult and stressful. I also object to the vast increase in traffic that would arise on the junction between the M25 and A3.

(4) I object to the additional strain that the Villages Medical Centre, Send will have as a result of the large increase in population in the area. This service is already overstretched and the development will exacerbate the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
all to see, only gets a passing mention. For example, the transport report by the developer's consultants has been torn apart following many comments and objections. Missing traffic numbers, grossly understating the impact of the development on trunk roads and local roads. The information provided in the Local Plan implies that if billions are spent on road and transport network improvement the development at Wisley could proceed with improvements funded by developers.

3.3. There appear to be 58 projects included in GBC wish list; statements have been made that for the housing program to move forward, it would require the majority of the programme of work to be delivered. At this point in time only 4 of the 58 projects have received committed funding even one of these is in doubt if Highways England is to be believed.

3.4. No solutions have been arrived at for the problems in the centre of Ripley. After more than 2 years of meetings and discussions involving SCC and the developer's consultants no workable solution has been identified. GBC local plan dismisses this significant problem saying it will be resolved with a "management solution". I would be very interested to hear what that solution could be and I suspect SCC highways would also be interested.

3.5. Both Highways England and SCC Highways issued holding objections in relation to the recent planning application for the Wisley site. This is, apparently, all they can now do as they are unable to refuse an application. If these two key agencies have expressed their grave reservation over the potential development on this site, why do GBC insist in promoting the site?

3.6. Under the latest Housing and Planning Bill, if sites are included in a local plan there is a presumption in favour of an application with matters of detail only to be resolved. Large slices of GBC traffic solutions are based on survey and analysis yet to be done when more detail can be made available. In other words they do not know the full extent of the problem. This information will be the result of a further examination of the issues and with solutions that are not currently apparent. I suppose this is the reason for the vagaries of the budgets. The only beneficiary of such an ill conceived and ill prepared approach will be lawyers representing the future developers when they are asked to pay for or contribute towards any mitigation.

3.7. The budget costings are said to err on the conservative side. Worked out on the back of a fag packet is more the case! How can anybody be expected to take a budget plan seriously when the individual projects have a budget plan estimate in the range of £100m to £250m on a single project. It is no wonder only 4 of the 58 projects have any commitment.

3.8. There are serious environment issues on the Wisley site and the nearby SPA. Pollution levels already exceed EU levels. The proposed SANG provision is immediately adjacent to the SPA a point that was criticized by Wildlife Trust, and Forestry Commission and initially by Natural England. The latter making a reversal of earlier comments following changes in personnel.

3.9. I therefore Object to the Wisley Airfield site being taken out of the Green Belt where it continues to serve the purposes intended by its original inclusion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisley

Very recently GBC gave 14 reasons for disallowing the planning application for a significant development at Wisley. Some of the reasons given were either insurmountable or insurmountable for all practical purposes. Yet having rejected this development Guildford Borough Council then, within weeks, includes it in their Local Plan.

How is this possible? There is no logic whatsoever in an organisation whole heartedly rejecting a proposal to then include the same proposal immediately in its Local Plan. Something cannot be fundamentally wrong for 14 reasons and yet be perfectly all right simultaneously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3401  Respondent: 15133377 / Joyce Vincente  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3402  Respondent: 15133377 / Joyce Vincente  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3958  Respondent: 15133377 / Joyce Vincente  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please do sent me conformation that all of these comments together with all my previous are passed to the Inspector.

I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1) It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

2) It is further from railway stations than any other identified strategic site.

3) It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

4) Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5) Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

6) Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

7) It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

   - The associated traffic increase from the RHS has not been taken into account.

   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

   - There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow, unlit local roads on a regular basis.

9) The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station 10). It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11) The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

12) Opportunity (3) should be common to all sites and is not unique to this site.

13) I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14) I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15) I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

16) I object to the removal of additional 3.1 ha from the green belt without any justification.

17) I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18) I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19) I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20) I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21) I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22) I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23) I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24) I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25) I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26) I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27) I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28) I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29) I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30) I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31) I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32) I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33) I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34) I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35) 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.

For the reasons listed above and numerous other reasons, I consider that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/8307  **Respondent:** 15136769 / NATS LTD (Sacha Rossi)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

NATS has reviewed the Local Plan. While we acknowledge that reference to our DVOR/DME installations is made on page 206, our preference would be to include a statement as follows:

- The airfield site hosts an aeronautical navigation beacon, known as the Ockham DVOR/DME. This is an integral part of the UK aeronautical infrastructure and serves a number of major airports in the South East. When considering planning application(s), engagement with the operator (NATS En Route PLC) should be sought as early as practicable in order to ensure that any impact may be assessed and so that any relevant conditions and obligations to planning permission(s) can be attached.

in the table on page 205 ‘POLICY A35: Land at former Wisley airfield, Ockham’ under the REQUIREMENTS entry.

This is to highlight the importance of the aeronautical infrastructure and to ensure engagement with NATS is as early as possible should the current plans for the area be subject to alteration in any way.

Thanks and regards
I refer to the Consultation below and can confirm that having reviewed the LPD NATS is satisfied that its comments have been incorporated, specifically around the NATS owned DVOR/DME Aeronautical Beacon at Wisley airfield.

POLICY A35: Former Wisley airfield, Ockham,

Requirement 8, page 226.

Accordingly, NATS has no further comments to make.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

d. The danger this traffic will be to local
cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them). The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

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I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5514  **Respondent:** 15138273 / David Latin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Of particular concern to me and my family is that a more local level the proposals include:

2,068 houses on the former Wisley Airfield (2.1 miles away).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPS16/232  Respondent: 15141953 / R Pomphrey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 the Wisley airfield site despite rejection by GBC of it's unsuitability

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5439  Respondent: 15147809 / Elmbridge Borough Council (Suzanne Parkes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy A35 – Land at Former Wisley Airfield, Ockham

In regards to the proposed new settlement at Wisley (Policy A35) it is acknowledged that there are two amendments to the site’s boundary. In regard to the first amendment it is understood that additional land is being added that was previously not considered available for allocation / development. Whilst there is no objection to the land being added per se, it is queried whether the identified capacity of the site should be amended to reflect the additional land now included. Should the potential capacity of the site change consideration should also be given to an additional impact on infrastructure requirements that would need to be included within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1601  Respondent: 15150817 / Robert Winborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6) I OBJECT TO Site A35 Wisley Airfield. The development of 2000 homes are unsustainable and totally inappropriate in the Green Belt Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/298  Respondent: 15151009 / G Stonehouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Wisley Airfield

3.1. The proposal to include this site in the Local Plan and remove it from the green belt is puzzling as it was the subject of a planning application refusal in recent months.

3.2. The reason given for the refusal was because the site was within the Green Belt. So why do that when GBC had the clear intention of moving the site out of the Green Belt within next few weeks? There were other reasons that were glossed over in the report that are not resolved by GBC recent actions. The impact on infrastructure, which is clear for all to see, only gets a passing mention. For example, the transport report by the developer's consultants has been torn apart following many comments and objections. Missing traffic numbers, grossly understating the impact of the development on trunk roads and local roads. The information provided in the Local Plan implies that if billions are spent on road and transport network improvement the development at Wisley could proceed with improvements funded by developers.

3.3. There appear to be 58 projects included in GBC wish list; statements have been made that for the housing program to move forward, it would require the majority of the programme of work to be delivered. At this point in time only 4 of the 58 projects have received committed funding even one of these is in doubt if Highways England is to be believed.

3.4. No solutions have been arrived at for the problems in the centre of Ripley. After more than 2 years of meetings and discussions involving SCC and the developer's consultants no workable solution has been identified. GBC local plan dismisses this significant problem saying it will be resolved with a "management solution". I would be very interested to hear what that solution could be and I suspect SCC highways would also be interested.

3.5. Both Highways England and SCC Highways issued holding objections in relation to the recent planning application for the Wisley site. This is, apparently, all they can now do as they are unable to refuse an application. If these two key agencies have expressed their grave reservation over the potential development on this site, why do GBC insist in promoting the site?

3.6. Under the latest Housing and Planning Bill, if sites are included in a local plan there is a presumption in favour of an application with matters of detail only to be resolved. Large slices of GBC traffic solutions are based on survey and analysis yet to be done when more detail can be made available. In other words they do not know the full extent of the problem. This information will be the result of a further examination of the issues and with solutions that are not currently apparent. I suppose this is the reason for the vagaries of the budgets. The only beneficiary of such an ill conceived and ill prepared approach will be lawyers representing the future developers when they are asked to pay for or contribute towards any mitigation.

3.7. The budget costings are said to err on the conservative side. Worked out on the back of a fag packet is more the case! How can anybody be expected to take a budget plan seriously when the individual projects have a budget plan estimate in the range of £100m to £250m on a single project. It is no wonder only 4 of the 58 projects have any commitment.

3.8. There are serious environment issues on the Wisley site and the nearby SPA. Pollution levels already exceed EU levels. The proposed SANG provision is immediately adjacent to the SPA a point that was criticized by Wildlife Trust, and Forestry Commission and initially by Natural England. The latter making a reversal of earlier comments following changes in personnel.

3.9. I therefore Object to the Wisley Airfield site being taken out of the Green Belt where it continues to serve the purposes intended by its original inclusion.

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<th>Respondent: 15154241 / Brendan Laing</th>
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Attached documents:

Comment ID: PSLPS16/2678  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
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6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/341  Respondent: 15155393 / Heidi Powell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I’d like my comments below to be taken into consideration for the GBC local plan:

Site A35 / Wisley Airfield

1. I object to this proposal. I objected to this site in 2014 and my views are unchanged. This is a significant development which is not appropriate for the area. It is a greenbelt site and should be kept as such. I find the plan to build 2000 houses is unacceptable and completely at odds with surrounding land use.

2. In addition such a huge volume of housing will add to the already significant access issues to the M25 / J10 and A3. It would also create unacceptable traffic congestion / “rat runs” on the surrounding minor roads.

3. I am very concerned about how local services from education to healthcare could cope with such a large additional population in the area. I question whether this has been properly taken into account and incorporated into the GBC plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/348</th>
<th>Respondent: 15156033 / Fred Smith</th>
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Support for Wisley Airfield

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1. We strongly object to the ongoing proposal for 2000+ homes on the Wisley former airfield site. We believe that this will create an unacceptable strain on local resources such as road and rail transport, schooling and medical services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: PSLPS16/368  Respondent: 15157697 / Matthew Hulme  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Dear Guildford Borough Council, I think Wisley Airfield is the right location for a new community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/534  Respondent: 15180193 / Paul Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

10.)Finally please explain why the inclusion of 2,000 homes at Wisley is still in the plan despite earlier rejection by the GBC on the grounds that they are unsuitable.  This gives me no confidence that a logical and valid process is being followed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/427  Respondent: 15184353 / Brian Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>15184705 / James Jamieson</th>
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I write with reference to the above submission plan.

I would be grateful if you could kindly confirm that all of these comments together with all my previous comments will be passed to the Inspector. I reserve my right to appear at the inquiry.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe, putting my family and others in danger.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. RHS Wisley traffic already cause frequent congestion by traffic on local roads – there is already vulnerability and this will get worse.

1. The associated traffic increase from the RHS has not been taken into account.
2. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis – again, more danger and potential fatalities.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB and destroy the far reaching countyside views for future generations. Surely there is a responsibility to maintain this?

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees – Why bother to consult if you then ignore the overwhelming popular view?.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

It is my belief bearing in mind the reasons listed above from a not exhaustive list that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1)  I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2)  I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. How can land be identified as Green Belt ie: protected and then ‘unprotected’ like this – it is a mockery of the whole concept of protection!

3)  I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4)  I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is simply too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Commuters going to Effingham station are NOT going to cycle or walk!
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. These are small lanes which don’t have the capacity to take this sort of traffic.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The increase in traffic will create a danger to those who do cycle (and pedestrians walking to the woods with their dogs), due to the absence of any cycling paths and the lack of pedestrian footpaths (as there is no space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Where are all these extra commuters going to park? This will lead to further development of common land which is again ‘protected’.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNIC).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, which is already in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. I am asthmatic as is my father.

9) I object to the fact 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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I simply fail to see how the local planning committee can be even reconsidering this application with so many people objecting. It certainly appears to me that the opinions of the locals are not being listened to at all. Rumours abound concerning the investment company whose registered office is in the Cayman Islands and one has to wonder given recent exposes concerning companies from that region whether everything is actually as it should be……
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3696  Respondent: 15185185 / Jeff Gill  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I believe this is now the third or even fourth time I seem to be writing to object to this planning submission. I am at a lost to understand why this is repeatedly being put forward with such minor changes as to be not worth reconsidering and this is despite being rejected by thousands of local residents. This is being planned at the detriment of the local community.

I object to this submission plan AGAIN due to the poor quality and lack of transparency in the evidence to support this case - and you will note my objections below.

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

In summary I again object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. 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.

I consider for the reasons listed above, yet again, this plan is unsound and not fit for purpose. I object to this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.

The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself is too spread out to anticipate a reduced reliance on private cars

1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

1. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the lack of space to provide for them)

1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

1. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• The plan proposes that ‘Major new developments will provide….. educational facilities….’ (and other infrastructure); but there appears to be no additional secondary schooling attached to the enormous development proposed for Wisley.
• The Wisley & Blackwell Farm proposals will put a huge strain on the A3 which anyone using it on a regular basis will be able to tell you is already under considerable strain.
• The Wisley development has been previously rejected so it is disappointing & surprising to see it back in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/460  Respondent: 15192097 / Angelina Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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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.

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1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

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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:** pslp172/1210  **Respondent:** 15192257 / Jennifer Cliff  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to the increase in the site (A35 former Wisley Airfield). The increase in size to 95.9 hectares will further increase traffic congestion and pollution, which are already above safe levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

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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.

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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a VITAL role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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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:** pslp172/3598  **Respondent:** 15196385 / Lucy Jamieson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe, putting my family and others in danger.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. RHS Wisley traffic already cause frequent congestion by traffic on local roads – there is already vulnerability and this will get worse.

1. The associated traffic increase from the RHS has not been taken into account.
2. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis – again, more danger and potential fatalities.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB and destroy the far reaching county side views for future generations. Surely there is a responsibility to maintain this?

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees – Why bother to consult if you then ignore the overwhelming popular view?.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting taxpayers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

It is my belief bearing in mind the reasons listed above from a not exhaustive list that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/518  **Respondent:** 15197249 / Deborah Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

<table>
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<tr>
<td>1. Wisley Airfield</td>
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<td>3.1. The proposal to include this site in the Local Plan and remove it from the green belt is puzzling as it was the subject of a planning application refusal in recent months.</td>
</tr>
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<td>3.2. The reason given for the refusal was because the site was within the Green Belt. So why do that when GBC had the clear intention of moving the site out of the Green Belt within next few weeks? There were other reasons that were glossed over in the report that are not resolved by GBC recent actions. The impact on infrastructure, which is clear for all to see, only gets a passing mention. For example, the transport report by the developer's consultants has been torn apart following many comments and objections. Missing traffic numbers, grossly understating the impact of the development on trunk roads and local roads. The information provided in the Local Plan implies that if billions are spent on road and transport network improvement the development at Wisley could proceed with improvements funded by developers.</td>
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<td>3.3. There appear to be 58 projects included in GBC wish list; statements have been made that for the housing program to move forward, it would require the majority of the programme of work to be delivered. At this point in time</td>
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only 4 of the 58 projects have received committed funding even one of these is in doubt if Highways England is to be believed.

3.4. No solutions have been arrived at for the problems in the centre of Ripley. After more than 2 years of meetings and discussions involving SCC and the developer's consultants no workable solution has been identified. GBC local plan dismisses this significant problem saying it will be resolved with a “management solution”. I would be very interested to hear what that solution could be and I suspect SCC highways would also be interested.

3.5. Both Highways England and SCC Highways issued holding objections in relation to the recent planning application for the Wisley site. This is, apparently, all they can now do as they are unable to refuse an application. If these two key agencies have expressed their grave reservation over the potential development on this site, why do GBC insist in promoting the site?

3.6. Under the latest Housing and Planning Bill, if sites are included in a local plan there is a presumption in favour of an application with matters of detail only to be resolved. Large slices of GBC traffic solutions are based on survey and analysis yet to be done when more detail can be made available. In other words they do not know the full extent of the problem. This information will be the result of a further examination of the issues and with solutions that are not currently apparent. I suppose this is the reason for the vagaries of the budgets. The only beneficiary of such an ill conceived and ill prepared approach will be lawyers representing the future developers when they are asked to pay for or contribute towards any mitigation.

3.7. The budget costings are said to err on the conservative side. Worked out on the back of a fag packet is more the case! How can anybody be expected to take a budget plan seriously when the individual projects have a budget plan estimate in the range of £100m to £250m on a single project. It is no wonder only 4 of the 58 projects have any commitment.

3.8. There are serious environment issues on the Wisley site and the nearby SPA. Pollution levels already exceed EU levels. The proposed SANG provision is immediately adjacent to the SPA a point that was criticized by Wildlife Trust, and Forestry Commission and initially by Natural England. The latter making a reversal of earlier comments following changes in personnel.

3.9. I therefore Object to the Wisley Airfield site being taken out of the Green Belt where it continues to serve the purposes intended by its original inclusion.

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Attached documents:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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<th>Comment ID: PSLPS16/562</th>
<th>Respondent: 15206721 / Beverly Saidman</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

--

**Comment ID:** PSLPS16/2654  **Respondent:** 15207425 / Elizabeth Davey  **Agent:**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an intergenerational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/638  Respondent: 15216129 / Timothy Hewlett  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:

1) 

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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.

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7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/7319  Respondent: 15216129 / Timothy Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4240  Respondent: 15216129 / Timothy Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

RE: GUILDFORD BOROUGH COUNCIL DRAFT LOCAL PLAN

The submission plan for the above is completely unfit for purpose, containing as it does a number of fundamental errors. As well as this I find the evidence base in the plan to be almost unbelievably poor and I find it hard to believe that this is the work of professional people. The lack of clarity is worrying and reports that I have received regarding the information being difficult to access for people with poor internet connections leads me to wonder if there is an ulterior motive that has led to this difficulty being deliberately put in the way of people as these try to assess this important matter.

I continue to object in the strongest possible terms to the totally unjustified inclusion of policy A35, Three Farms Meadows in the draft Local Plan for the following reasons:

Transport

(Matters that make the site completely unsuitable for inclusion in the local plan):

Three Farms Meadows is adjacent to the most congested stretch of strategic road network in Surrey and close to one the most congested junction in the country (J10 of the M25 and the A3) and the amount of traffic using this area of road it set to increase significantly. No amount of changes to that junction in the future will change these facts. Because of this, any egress onto A3 from Three Farms Meadows at any point will be extremely dangerous and cannot be allowed.

Local roads are already at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks and so on). The roads in the immediate area around Three Farms Meadows are extremely narrow and no responsible plan should seek to increase traffic on these roads. I challenge any Guildford Borough Council employee or elected official to drive around these local roads with me to see how suitable they are.

Any existing or new public transport provision such as bus services to/from Guildford or destinations towards London has to, and will have to negotiate these over-crowded major and minor roads and will therefore be unreliable and subject to frequent delays. This has always been the case with bus services in the area around Three Farms Meadows – as anyone (myself included) who has previously had experience of Green Line / London Country 715 route bus services can testify to. Any new bus services to Horsley or anywhere else will impact the safety of the local road network and lead to road traffic accidents as the lanes are not wide enough to accommodate buses. Again, I challenge any Guildford Borough Council employee or elected official to drive around these local roads with me to see how suitable they are.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable. I object to the fact that the Council
appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification whatsoever.

Finally, on transport, I would point out that Three Farms Meadows is further from railway stations than any other identified strategic site in the local plan. These railway stations are visited by trains that are already extremely overcrowded and no there is no short term, medium term of long term rail plan to overcome this overcrowding. I challenge any Guildford Borough Council employee or elected official to drive to these railway stations with me to see how realistic it is to drive to them and to see the car parking provision at these stations.

Finally, on transport, I would point out that Three Farms Meadows is further from railway stations than any other identified strategic site in the local plan. These railway stations are visited by trains that are already extremely overcrowded and no there is no short term, medium term of long term rail plan to overcome this overcrowding. Car parks at all of these railway stations are already full. How can anyone possibly think that the flood of additional vehicle from Three Farms Meadows would do anything but add to this parking problem.

**Environment**

(Matters that make the site completely unsuitable for inclusion in the local plan):

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area, all of which together make a unique and environment – so close to Greater London. These changes to the site boundaries are not identified correctly on the plan (Appendix H p16). As well as this I object to the fact that the increased area, being on the south of the site facing the Surrey Hills Area of Outstanding Natural Beauty will increase the negative impact of the views from the Area of Outstanding Natural Beauty. Unless this monstrous idea is withdrawn Guildford Borough Council will be responsible for an irredeemable act of environmental vandalism.

I object to paragraph 21 which “limits” (notice the use of double quotes) development in flood zone 2 and 3 as development should be excluded in flood zone 2 and 3 and I object to paragraph 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the disregard for the impact of in-combination development on the Thames Basin Heaths Special Protection Area, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to the total lack of proper sewerage capacity for Three Farms Meadows in the local plan. How can supposedly professional people not make proper provision for this?

**Green Belt**

I object to the sinister removal of additional 3.1 ha from the green belt without any justification and I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact. This inclusion change can only be interpreted as a being undertaken in order to suit the needs of property developers and their aspirations to make money from this site regardless of the wishes of ordinary people. The inevitable and irreversible damage to the local environment that removal from Green Belt would entail would first and foremost the fault of Guildford Borough Council.

**The wishes of the local population, the lack of proper consultation and lack of due process**

(Matters that make the site completely unsuitable for inclusion in the local plan):

I object to the fact that the council has failed to remove this site from the local plan despite receiving thousands of objection from local residents and statutory consultees. I am appalled and puzzled that the Council continues to fly in face of the wishes of the local population in this matter and I can only assume that those persons who responsible for this plan have ulterior motives for including Three Farms Meadows in the plan.

I object to the significant modifications that have made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. I
object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19
consultation when the changes are major. I object to the disturbing fact that there is no clear justification for the removal
of one strategic site over site A35.

There are many other totally justified objections in addition to the above that I could make to this appalling plan and I
have no doubt that many thousands of other people will make those points in their objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5421  Respondent: 15216129 / Timothy Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

RE: GUILDFORD BOROUGH COUNCIL DRAFT LOCAL PLAN

The submission plan for the above is completely unfit for purpose, containing as it does a number of fundamental errors.
As well as this I find the evidence base in the plan to be almost unbelievably poor and I find it hard to believe that this is
the work of professional people. The lack of clarity is worrying and reports that I have received regarding the
information being difficult to access for people with poor internet connections leads me to wonder if there is an ulterior
motive that has led to this difficulty being deliberately put in the way of people as these try to assess this important
matter.

I continue to object in the strongest possible terms to the totally unjustified inclusion of policy A35, Three Farms
Meadows in the draft Local Plan for the following reasons:

Transport
(Matters that make the site completely unsuitable for inclusion in the local plan):

Three Farms Meadows is adjacent to the most congested stretch of strategic road network in Surrey and close to one the
most congested junction in the country (J10 of the M25 and the A3) and the amount of traffic using this area of road it set
to increase significantly. No amount of changes to that junction in the future will change these facts. Because of this,
any egress onto A3 from Three Farms Meadows at any point will be extremely dangerous and cannot be allowed.

Local roads are already at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks and
so on). The roads in the immediate area around Three Farms Meadows are extremely narrow and no responsible plan
should seek to increase traffic on these roads. I challenge any Guildford Borough Council employee or elected official to
drive around these local roads with me to see how suitable they are.

Any existing or new public transport provision such as bus services to/from Guildford or destinations towards London
has to, and will have to negotiate these over-crowded major and minor roads and will therefore be unreliable and subject
to frequent delays. This has always been the case with bus services in the area around Three Farms Meadows – as anyone
(myself included) who has previously had experience of Green Line / London Country 715 route bus services can testify
to. Any new bus services to Horsley or anywhere else will impact the safety of the local road network and lead to road
traffic accidents as the lanes are not wide enough to accommodate buses. Again, I challenge any Guildford Borough
Council employee or elected official to drive around these local roads with me to see how suitable they are.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised
by Mouchel for using out of date modelling software and is therefore unreliable. I object to the fact that the Council
appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification whatsoever.

Finally, on transport, I would point out that Three Farms Meadows is further from railway stations than any other identified strategic site in the local plan. These railway stations are visited by trains that are already extremely overcrowded and no there is no short term, medium term of long term rail plan to overcome this overcrowding. I challenge any Guildford Borough Council employee or elected official to drive to these railway stations with me to see how realistic it is to drive to them and to see the car parking provision at these stations.

Finally, on transport, I would point out that Three Farms Meadows is further from railway stations than any other identified strategic site in the local plan. In any case, these stations are visited by trains that are already extremely overcrowded and no there is no short term, medium term of long term rail plan to overcome this overcrowding. Car parks at all of these railway stations are already full. How can anyone possibly think that the flood of additional vehicle from Three Farms Meadows would do anything but add to this parking problem.

Environment

(Matters that make the site completely unsuitable for inclusion in the local plan):

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area, all of which together make a unique and environment – so close to Greater London. These changes to the site boundaries are not identified correctly on the plan (Appendix H p16). As well as this I object to the fact that the increased area, being on the south of the site facing the Surrey Hills Area of Outstanding Natural Beauty will increase the negative impact of the views from the Area of Outstanding Natural Beauty. Unless this monstrous idea is withdrawn Guildford Borough Council will be responsible for an irredeemable act of environmental vandalism.

I object to paragraph 21 which “limits” (notice the use of double quotes) development in flood zone 2 and 3 as development should be excluded in flood zone 2 and 3 and I object to paragraph 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the disregard for the impact of in-combination development on the Thames Basin Heaths Special Protection Area, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to the total lack of proper sewerage capacity for Three Farms Meadows in the local plan. How can supposedly professional people not make proper provision for this?

Green Belt

I object to the sinister removal of additional 3.1 ha from the green belt without any justification and I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact. This inclusion change can only be interpreted as a being undertaken in order to suit the needs of property developers and their aspirations to make money from this site regardless of the wishes of ordinary people. The inevitable and irreversible damage to the local environment that removal from Green Belt would entail would first and foremost the fault of Guildford Borough Council.

The wishes of the local population, the lack of proper consultation and lack of due process

(Matters that make the site completely unsuitable for inclusion in the local plan):

I object to the fact that the council has failed to remove this site from the local plan despite receiving thousands of objection from local residents and statutory consultees. I am appalled and puzzled that the Council continues to fly in face of the wishes of the local population in this matter and I can only assume that those persons who responsible for this plan have ulterior motives for including Three Farms Meadows in the plan.

I object to the significant modifications that have made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes. I
object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major. I object to the disturbing fact that there is no clear justification for the removal of one strategic site over site A35.

There are many other totally justified objections in addition to the above that I could make to this appalling plan and I have no doubt that many thousands of other people will make those points in their objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/645  Respondent: 15219489 / Victoria Parnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My main concerns relate to the development of the Wisley Airfield with 2000 houses and the redrawing of the Green Belt and in particular the removal of rural villages such as East Horsley from the Green Belt.

I moved into East Horsley from Cobham last year after living 21 years in Cobham – and before that 12 years in Claygate.

Over those years I have seen the gradual creeping of urbanisation outwards from London. The Green Belt was established to prevent seepage of urbanisation so that no rural separation would remain between villages. The Green Belt is necessary to protect our environment and residents’ enjoyment of that environment.

Additionally there is already serious congestion because of the number of residents already living here and their pressure on limited amenities.-

- rail station car parks are already full at Effingham Junction and East Horsley

- A3 and M25 congestion including at junctions. eg most days there are periods when traffic going west on the M25 below the boundary with Elmbridge is at a standstill.

- air quality deterioration

- ? schools

- affect on mental health of residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/646  Respondent: 15219585 / Ray Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object very strongly to the inclusion of the Former Wisley Airfield (FWA/TFM) in the local plan. Extensive public consultation has shown the madness of the idea to build over 2000 houses on the FWA. It is absolutely shocking that GBC is still including the Former Wisley Airfield in the local plan. GBC has no concern for democracy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/650  Respondent: 15220225 / W Carver  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My wife and I have lived in Ockham for over 40 years and find that the plan for Wisley Airfield completely out of order. The traffic congestion at the moment is at a ridiculous high level and the roads in the Ockham are at gridlock several times each day. The fact that the roads are not maintained properly and the sides of the roads are full of potholes and there are potholes even in the middle of the roads are not uncommon.

Furthermore this would lead to a big intrusion into the green belt and the pollution would be beyond belief.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/658  Respondent: 15225281 / Roger Gamlin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I Object

This development has not had full consultation under Regulation 18.

This development is far too large for local area to sustain, the local roads and services will not cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6420  Respondent: 15225281 / Roger Gamlin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the large proposed development of 2,000 houses at Wisley Airfield (A35)

It will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Ripley & Send.

The re-inclusion in the Plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham) is fundamentally wrong. Following a huge public outcry, Guildford Planning Committee has unanimously rejected a recent planning application for precisely this development on 14 separate grounds.

Policy A35 should be removed from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land less than 15% is
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and
- Loss of high-quality agricultural land (55% of the site), in breach of national
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley
- Failure to evaluate the cumulative impact of this and nearby development sites on the

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/674  Respondent: 15227329 / Sharon Pask  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 4th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is immediately removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is immediately removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the continued inclusion of a site (the former Wisley Airfield, now - known as Three Farm Meadows) - where
the planning application has already unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL)
planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/689  Respondent: 15227617 / James Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK,
including Highways England, Thames Water, NATS and the Environmental Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows),
Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/743  Respondent: 15227617 / James Pask  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in
protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from
London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land
from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield,- now known as Three Farm Meadows)-
where the planning application has already been unanimously rejected by GBC's Planning Committee .

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL)
planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK,

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows),
Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/685  Respondent: 15227905 / Nigel Alexander  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green

The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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Comment ID: PSLPS16/6562  Respondent: 15227905 / Nigel Alexander  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):
• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/712</th>
<th>Respondent: 15232513 / Barnaby Lawrence</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of house - basically a New Town. The planning committee have unanimously refused planning permission for houses to be built on that site so there is no reason to include it in the Local Plan. I object to the local council not making these reasons known - if there are any, which I doubt there are except possible financial considerations which have again not been made clear.

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses as ‘localism’, taking note of what the local people want, is supposed to be the new watchword in political circles especially after the Referendum vote showed exactly how out of touch the governors are with the governed. In this case the governed do not want a development on the airfield, Three Farm meadows, as particularly evidenced by the unusually high rejection of the people to the inclusion of it in the local plan. If the Council continue to fly in the face of local wishes they too will in the end suffer at the hands of the electorate in the same way as the Government did at their hands.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to the proposition that the development will result in a meaningful shift to cycling and walking. The development is miles from anywhere and the residents will be entirely reliant on their cars to get about as there are no transport links of any kind except narrow roads and the enormously busy M25/A3 junction, which could not stand an influx of
thousands of extra cars. There have in my experience in the last month already been two accidents on the section 
of the A3 between the M25 and the Wisley Roundabout and that is with the present amount of traffic.

Because the Olympic Cycle race and the Prudential Ride London–Surrey cycle race come through Ripley and past 
Ockham and Horsley, Cyclists are encouraged to cycle throughout this area and the number of cyclists on these 
narrow roads has increased dramatically especially in Saturday mornings, the favoured shopping time for most 
people, when large phalanxes of cyclist can be seen racing down the narrow lanes covering them from hedgerow 
to hedgerow. I object to the addition of any extra cars that will be a massive danger to these cyclists and 
discourage cycling in direct contravention of the governments aim to encourage it.

Wisley Gardens has proposed an expansion which will increase visitor traffic more than it stands today and so I 
object to any proposal that will increase the traffic any further and put an already over populated road junction 
under even greater strain making long stationary queues a probable permanent feature of this junction. Come and 
see what five thousand extra people visiting Wisley Gardens on special event days does to the M25/A3 junction as 
well as The Ripley Roundabout.

I object to the detrimental effect the development would have on there character of the area, what I believe the 
planners refer to as ‘street scene’. ALL houses in Ockham, the nearest village, are old, vernacular, set back from 
the road, built in hollows or behind trees, are a maximum of two stories, with perhaps and attic conversion, and 
very sparsely arranged in terms of number of houses per hectare. This development is scheduled for the crest of a 
hill, it is urban in nature, has a population density equal to or greater than the most congested parts of London 
and will have living units up to five stories high; twice the height of anything in the area.

I object to the fact that even though the local people (those living in Ripley, Ockham, Wisley, and the Horsleys) do 
not want it, even though the planning committee have unanimously rejected it, STILL the Council are fighting 
tooth and nail to have it included in the Local Plan. Why??? As the ubiquitous phrase would have it - 'Follow the 
money'.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), 
Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4051  Respondent: 15232513 / Barnaby Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally 
Compliant? ( )

I object to the inclusion of Three Farms Meadows (otherwise known as Wisley Airfield) Development in the Local Plan 
and would like it removed.

I object to the fact that It is in the wrong place as it will be under the pollution cloud form M25 Junction10, it is 
constrained by ill-equipped country lanes, SSSIs, lack of public transport links.

I object to the injection of thousands more cars into transport links that are already often subject to overcrowding 
especially on warm sunny days when everybody and his wife visits Wisely Gardens and they intend to increase their 
visitor numbers.

I object to to being too big and aggressively impacts the openness of the Green Blet, by being built high, along the 
skyline and to use the Councils own phraseology is of too great a 'Bulk and Mass'
I object to the fact that the Council has no justification for removing the land from the Green Belt except that they want to.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object that only a portion of the plan is being considered when it should be the totality of the plan that is under consideration. The Council have given reasons for this when the changes are major changes.

I object to the Council ignoring the thousands of objections from private individuals and also the objections from statutory bodies requesting the removal of the site from the plan.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the plan would appear to be full of inaccuracies - eg. in one part of the document the started number of houses is 12,426 and yet when the figures in the table are added up the total is 9,810. It is therefore not possible to consider the plan until it is presented accurately otherwise it is open to misinterpretation and challenge upon challenge because its foundation is so weak.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. There are many many more objections to which I would add my name, but I have already done so over and over again and I am getting really really fed up with being forced to over and over again object and object and object.

The development is basically unsound and purely speculative and anyone who has no ulterior motive can see it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/718  **Respondent:** 15233153 / Anthony Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

1. **Wisley Airfield**

3.1. The proposal to include this site in the Local Plan and remove it from the green belt is puzzling as it was the subject of a planning application refusal in recent months.

3.2. The reason given for the refusal was because the site was within the Green Belt. So why do that when GBC had the clear intention of moving the site out of the Green Belt within next few weeks? There were other reasons that were glossed over in the report that are not resolved by GBC recent actions. The impact on infrastructure, which is clear for all to see, only gets a passing mention. For example, the transport report by the developer's consultants has been torn apart following many comments and objections. Missing traffic numbers, grossly understating the impact of the development on trunk roads and local roads. The information provided in the Local Plan implies that if billions are spent on road and transport network improvement the development at Wisley could proceed with improvements funded by developers.

3.3. There appear to be 58 projects included in GBC wish list; statements have been made that for the housing program to move forward, it would require the majority of the programme of work to be delivered. At this point in time only 4 of the 58 projects have received committed funding even one of these is in doubt if Highways England is to be believed.
3.4. No solutions have been arrived at for the problems in the centre of Ripley. After more than 2 years of meetings and discussions involving SCC and the developer's consultants no workable solution has been identified. GBC local plan dismisses this significant problem saying it will be resolved with a “management solution”. I would be very interested to hear what that solution could be and I suspect SCC highways would also be interested.

3.5. Both Highways England and SCC Highways issued holding objections in relation to the recent planning application for the Wisley site. This is, apparently, all they can now do as they are unable to refuse an application. If these two key agencies have expressed their grave reservation over the potential development on this site, why do GBC insist in promoting the site?

3.6. Under the latest Housing and Planning Bill, if sites are included in a local plan there is a presumption in favour of an application with matters of detail only to be resolved. Large slices of GBC traffic solutions are based on survey and analysis yet to be done when more detail can be made available. In other words they do not know the full extent of the problem. This information will be the result of a further examination of the issues and with solutions that are not currently apparent. I suppose this is the reason for the vagaries of the budgets. The only beneficiary of such an ill conceived and ill prepared approach will be lawyers representing the future developers when they are asked to pay for or contribute towards any mitigation.

3.7. The budget costings are said to err on the conservative side. Worked out on the back of a fag packet is more the case! How can anybody be expected to take a budget plan seriously when the individual projects have a budget plan estimate in the range of £100m to £250m on a single project. It is no wonder only 4 of the 58 projects have any commitment.

3.8. There are serious environment issues on the Wisley site and the nearby SPA. Pollution levels already exceed EU levels. The proposed SANG provision is immediately adjacent to the SPA a point that was criticized by Wildlife Trust, and Forestry Commission and initially by Natural England. The latter making a reversal of earlier comments following changes in personnel.

3.9. I therefore Object to the Wisley Airfield site being taken out of the Green Belt where it continues to serve the purposes intended by its original inclusion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/726  Respondent: 15233921 / Kiki Samantha Nicholson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I fully support the rejection by the entire planning committee of the development of Wisley airfield (Three Farm Meadows) to the inclusion of the site formerly known as Wisley Airfield in the local plan and object strongly to its continued inclusion.
I object to the inclusion of the site known as Wisley Airfield in the local plan as it goes against the published Ockham Parish Local Plan which we are encouraged to issue so that everybody has a clear idea of what local people actually want rather than what the Council think they want.

I object to the awful impact a development on Wisley will have on transport, local roads and road safety.

I object to the impact on the local environment such a development would have especially on the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI)

I object to attempts to remove Three Farm meadows (Formerly known as wisely airfield) from the green belt. The site is actually prime agricultural land that the government promised to remove the airstrip from it when they had finished with it and under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the mass of cars that will be unleashed on our narrow roads that are flooded with cyclists.

I object to more cars on our roads as there are no provisions for pedestrians and we take our lives in our hands when we walk the roads even with the traffic we have now and there is no room for pavements.

I object to the Council using inflated/dodgy statistics (West Surrey Strategic Market Housing Assessment (SHMA)) to base their need for so many houses.

I object to the proposition that the development will result in a meaningful shift to cycling and walking, of course it won’t as there are no transport links and the new residents will obviously use their cars.

I object to the fact that the houses that are proposed are completely out of keeping with the whole area.

I object to the fact that even though the planning committee have unanimously rejected it, even though the local people don’t want it, the Council are still determined to have it included in the Local Plan.

I object to the Council trying to force people to live in an atmosphere poisoned by fumes from the M25/A3.

I object to the fact that Guildford Borough Council are completely ignoring the Ockham Parish Local Plan,

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

1. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows)- where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3852  Respondent: 15234529 / Oliver Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)- Allocation A35-for the phased development of a new settlement of up to 2100 dwellings

I object to the draft local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBE).

5) I object to the threat the local Plan poses to the historic rural village of Ockham and the Blighton properties there. 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 2,000 dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development walking. The development is too isolated, and even within the development

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RH S Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25! A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously—air pollution in many parts of the borough, and particularly at the M25! A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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 greenspaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield—now known as Three Farm Meadows)—where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by anumber of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/761  Respondent: 15234849 / Alastair Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Section page number
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Document page number
1979
I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3477  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons. I am writing again, and I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I object strongly to many of the things in the plan, including the following:

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I consider for these reasons and many others that this plan is unsound and not fit for purpose and I strongly object to it. I would be grateful to know that my objection has been received and sincerely considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/851  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. Three Farms Meadow site

I OBJECT also to there-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision - a clear signal to the developers to try again.

This is not an NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. "18

Policy A35 should be ditched from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of "exceptional circumstances".
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

"17 Application reference 15/P/00012.

"18 Including the Rt Han. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Han. Charles Balfour (director, descendant of the Tory Prime Minister).

- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA. Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

*****
"The River Mole would flood even more badly should a new runway be built at Gatwick.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/862  **Respondent:** 15245697 / Justine Butler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO site A35 land at Former Wisley airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/886  **Respondent:** 15247265 / Aileen Aitcheson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY A35: Land at former Wisley Airfield**

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and have objected against prior planning applications at this location. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly OBJECT to this proposed policy for the reasons below.

1. **a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:**

   The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

   Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers’ previous planning application was judged and rejected based upon the 2003 GBC
Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon ‘exceptional circumstances’, which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.

1. b) This site does not meet acceptable levels of sustainability:

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC’s consultant, AECOM, is presented in the Local Plan Evidence Base report ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional ‘traffic light’ system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as ‘Red’ by AECOM for this site, more than any other large site.

Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

- There are presently no schools, medical services or shops within walking distance of this site;

- There is presently no local employment at this site and little after the development is completed;

- There will be a significant destruction of agricultural land arising from this development;

- There will be significant environmental damage from this development;

- There is no public transport currently serving this location;
• The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity available.

• Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being ‘sustainable’;

• New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC’s own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

1. c) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley’s two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding ‘lanes’ – a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s through roads. Many of these ‘lanes’ are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these ‘lanes’.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

1. d) There are damaging health & safety implications arising from development at this site:

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide (‘NOx’) emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the “failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition” as one of the grounds for this rejection.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications
1. **e) The environmental impact on protected wildlife will be substantial:**

GBC’s *Land Availability Assessment* which supports Policy A35 states that the site lies within the 400m-5km ‘Zone of Influence’ of the Thames Basin Heaths Special Protection Area (‘SPA’). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance (‘SSSI’), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its ‘Thames Basin Heaths SPA Avoidance Strategy’.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an ‘Exclusion Zone’ where “there will be a presumption against additional new dwellings”. Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - 5km ‘Zone of Influence’ set out under the SPA policy, which requires developers to contribute a new SANG (‘Site of Alternative Natural Greenspace’) to mitigate for potential damage caused to the SPA from new development – the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

**Accordingly, I OBJECT to Policy A35 on grounds of its material adverse environmental impact.**

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste facility, means that the actual area of land available for housing development at this site is estimated to be around 43 hectares.

1. **f) The development is totally out of keeping with local character, context & distinctiveness:**

It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC’s very first housing policy, Policy H1, requires that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare (‘dph’).
East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.

Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks

I do not share the same vision for the future of Guildford Borough as GBC, although I do recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that “We will continue to protect the Metropolitan Green Belt” does not fool anybody.

Accordingly I OBJECT to the Proposed Submission Local Plan.

I sincerely request that GBC that radically re-assess its own policy objectives rather than force through the Council a Local Plan which clearly does not have the wider support of the residents of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/893  Respondent: 15247745 / Brian Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY A35: Land at former Wisley Airfield

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and have objected against prior planning applications at this location. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly OBJECT to this proposed policy for the reasons below.

1. **a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:**

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.*

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers’ previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon ‘exceptional circumstances’, which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

*Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.*

1. **b) This site does not meet acceptable levels of sustainability:**

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC’s consultant, AECOM, is presented in the Local Plan Evidence Base report ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional ‘traffic light’ system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as ‘Red’ by AECOM for this site, more than any other large site.

Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;
• New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+
  years to provide adequate sewage handling facilities for this site;

• There are presently no schools, medical services or shops within walking distance of this site;

• There is presently no local employment at this site and little after the development is completed;

• There will be a significant destruction of agricultural land arising from this development;

• There will be significant environmental damage from this development;

• There is no public transport currently serving this location;

• The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to
  walk. Neither station currently has significant parking capacity available.

• Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor
  vehicles for transport cannot be considered as being ‘sustainable’;

• New access roads will be needed and significant changes proposed to the surrounding road network, leading to
  further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the
environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a
large-scale new settlement in a poorly-sited green field location. However, as the GBC’s own consultant has
demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.

1. c) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East
Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East
Horsley’s two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding ‘lanes’ – a term
used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley’s
through roads. Many of these ‘lanes’ are without pavements for large stretches, whilst the principal through-roads of
Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these ‘lanes’.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

1. **d) There are damaging health & safety implications arising from development at this site:**

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide (‘NOx’) emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the “failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition” as one of the grounds for this rejection.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications.

1. **e) The environmental impact on protected wildlife will be substantial:**

GBC’s *Land Availability Assessment* which supports Policy A35 states that the site lies within the 400m-5km ‘Zone of Influence’ of the Thames Basin Heaths Special Protection Area (‘SPA’). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance (‘SSSI’), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its ‘Thames Basin Heaths SPA Avoidance Strategy’.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an ‘Exclusion Zone’ where “there will be a presumption against additional new dwellings”. Since the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - 5km ‘Zone of Influence’ set out under the SPA policy, which requires developers to contribute a new SANG (‘Site of Alternative Natural Greenspace’) to mitigate for potential damage caused to the SPA from new development – the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would
provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new
settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an
important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, I OBJECT to Policy A35 on grounds of its material adverse environmental impact.

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste
facility, means that the actual area of land available for housing development at this site is estimated to be around 43
hectares.

1. f) The development is totally out of keeping with local character, context & distinctiveness:

It is a key element of planning policy that new developments should be in keeping with the established pattern of
development in the area. In the 2016 Proposed Submission Local Plan, GBC’s very first housing policy, Policy H1,
requires that development should: “make the most efficient use of land whilst responding to local character, context and
distinctiveness.” However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create
a new settlement larger than any other in Guildford Borough, outside of Guildford itself. The nearby historic village of
Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding
area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste
facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares.
Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated
at around 49 dwellings per hectare (‘dph’).

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town,
with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area.
Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable
size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in
breach of GBC’s own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location.
It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously
presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages
have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as
well as a range of residential housing, predominantly detached two-storey houses or bungalows. They are all picturesque
villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in
southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if
this development goes ahead.

Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and
distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks
I do not share the same vision for the future of Guildford Borough as GBC, although I do recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that “We will continue to protect the Metropolitan Green Belt” does not fool anybody.

Accordingly I OBJECT to the Proposed Submission Local Plan.

I sincerely request that GBC that radically re-assess its own policy objectives rather than force through the Council a Local Plan which clearly does not have the wider support of the residents of Guildford 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: PSLPS16/899</th>
<th>Respondent: 15248161 / Fabio Ligi</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant?: ( )</td>
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<td>1. I object to the huge proposed building of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm. This will ruin large chunks of Green Belt and agricultural land and will add pressure on our area in terms of traffic in an already congested area, particularly the A3 / M25 area.</td>
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<th>Respondent: 15248321 / Gordon Pipe</th>
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2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/914  
Respondent: 15248449 / Peter Bessler  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) I also firmly object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

9) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2645  
Respondent: 15248449 / Peter Bessler  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport: The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to express my objection to the proposed policy A35, Three Farm Meadows in the draft local plan for several reasons:

1. The plan is a gross misuse of Greenbelt land whose very purpose is to stop the environmentally unsustainable and detrimental expansion of city areas at the cost of natural green space.
2. The local roads would not be able to sustain the increase in traffic. The A3 and M25 junction is already incredibly congested at all times and the country roads are narrow and dangerous. In recent months there have been multiple accidents at the Old Lane – Ockham Road crossroads.
3. The roads are not wide enough for the new suggested bus routes
4. I find the proposal for walking and cycling on these routes absurd and unbelievably dangerous due to the narrow twisting roads and frequently speeding cars from the A3.
5. There is already insufficient parking at local stations (which for many residents is much more than a quick walk or cycle away), and the addition of so many new residents will make the situation even worse.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should not be permitted in flood zone 2 and 3
7. I object to para 22 as this does not at all reflect the impact of the buildings on the surrounding area.
8. I object to the inclusion of a 10% buffer in the housing number over the plan period; this proposal is completely unnecessary.

I hope that yourself and the developers will consider these reasons when you decide whether or not to ruin our local area and community with these continued ‘cheap and convenient’ fixes to fulfil quotas when alternatives, such as constructing on the numerous brown field sites within and surrounding London, do exist.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I support a new community at Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/943  **Respondent:** 15254497 / Camilla O'Hare  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I often visit my parents, who live in Ockham, and the traffic around the M25/A3 Junction is frightening. If there were to be more cars, as I understand it around 4000, then that junction will become dangerously overcrowded. The local lanes are just not equipped to take that increase especially in view of the many cyclists who use the area that I often encounter in large groups.

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses. The planning committee have unanimously refused planning permission for houses to be built on that site so there is no reason to include it in the Local Plan. It cannot be built as there is no permission for it.

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses as it flies in the face of ‘localism’.

I especially object to the detrimental impact on transport, local roads and road safety. I specifically object to the proposition that the development will result in a meaningful shift to cycling and walking. The development is miles from anywhere and the residents will be entirely reliant on their cars to get about as there are no transport links of any kind except narrow roads and the enormously busy M25/A3 junction, which could not stand an influx of thousands of extra cars.

Because the Olympic Cycle race and the Prudential Ride London-Surrey cycle race come through Ripley and past Ockham and Horsley, Cyclists are encouraged to cycle throughout this area and the number of cyclists on these narrow roads has increased dramatically especially on Saturday mornings, the favoured shopping time for most people. I object to the addition of any extra cars that will be a massive danger to these cyclists and discourage cycling in direct contravention of the governments aim to encourage it.

Wisley Gardens has proposed an expansion which will increase visitor traffic more than it stands today and so I object to any proposal that will increase the traffic any further and put an already over populated road junction under even greater strain making long stationary queues a probable permanent feature of this junction.

I object to the detrimental effect the development would have on there character of the area. Houses in Ockham are old, vernacular, set back from the road, built in hollows or behind trees, are a maximum of two stories, with perhaps and attic conversion, and very sparsely arranged in terms of number of houses per hectare. This development is scheduled for the crest of a hill, it is urban in nature, has a population density equal to or greater than the most congested parts of London and will have living units up to five stories high; twice the height of anything in the area.
I strongly object to the detrimental effect the proposed development will have on the environment and the various sites of special significance that border it.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/944  **Respondent:** 15254561 / James Barnwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.
10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have further objections to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill Policy A25 and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I hope that all my objection points listed above will be taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5236  Respondent: 15257281 / Kath Frackiewicz  Agent: 15257281 / Kath Frackiewicz

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 Wisley Airfield and the land surrounding it from the Green Belt and to designate this area as a potential site for building some 2000 new homes. Again this is Green Belt and an open area which should be protected against the developer.

I object to the continued inclusion of Wisley Airfield (Three Farms Meadow) as a potential site for new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5237  Respondent: 15257281 / Kath Frackiewicz  Agent: 15257281 / Kath Frackiewicz

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley Airfield - I strongly object to any form of building here as I mention above. This is an area of Green Belt land with no infrastructure and non-existent transport facilities other than road access. The reasons for unsuitability and rejection of this area for potential development are well documented in the recent rejection by GBC Planning of a planning application for access to this site. The Wisley site must be removed from the Local Plan. Access from this site to the A3 is very poor and already the junction is at capacity at peak travel periods. Rail transport is already at full capacity and the car parks at nearby stations are fully utilised. The large increase of vehicular traffic and people from houses built at Wisley could not be absorbed by the current infrastructure and public facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1022  Respondent: 15258401 / Lynda Pullen  Agent: 15258401 / Lynda Pullen

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1060</th>
<th>Respondent: 15262369 / Matthew O'Hare</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)?

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I often visit my in-laws who live in Ockham, who are an integral part of our family. The traffic around the M25/A3 Junction, and indeed the local traffic level in Ockham, is already dangerous due to the volume. If there were to be more cars, as I understand it around 4000, then that junction will become dangerously overcrowded. The local lanes are just not equipped to take the inevitable increase in traffic, especially in view of the many cyclists who use the area.

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses. The planning committee have unanimously refused planning permission for houses to be built on that site so there is no reason to include it in the Local Plan. It cannot be built as there is no permission for it.

I object to the inclusion of the site formerly known as Wisley Airfield in the local plan as a possible site for the building of a large number of houses as it undermines the concept of localism and community cohesion and assent.

I especially object to the detrimental impact on transport, local roads and road safety. I specifically object to the proposition that the development will result in a meaningful detriment to the community’s ability to safely cycle or walk. The development is dislocated from public transport hubs and the residents will be entirely reliant on their cars to travel, as there are no transport links of any kind except narrow roads and the enormously busy M25/A3 junction, which could not stand an influx of thousands of extra cars.

Because the Olympic Cycle race and the Prudential Ride London-Surrey cycle race come through Ripley and past Ockham and Horsley, cyclists are encouraged to cycle throughout this area. The number of cyclists on these narrow roads has increased dramatically especially on Saturday mornings, coincidently the favoured shopping time for most people. I object to the addition of any extra cars that will be an undeniable danger to these cyclists; discouraging cycling in direct contravention of the governmental aspirations to encourage it both as a sport and mode of transport.

Wisley Gardens has proposed an expansion which will increase visitor traffic to a level that will already increase more than it stands today and so I object to any proposal that will increase the traffic any further and put an already over populated road junction under even greater strain making long stationary queues a probable permanent feature of this junction.

I object to the detrimental effect the development would have on the character of the area. Houses in Ockham are old, vernacular, set back from the road, built in hollows or behind trees, are a maximum of two stories, with perhaps an attic.
conversion, and very sparsely arranged in terms of number of houses per hectare; it is part of our local culture and heritage. This development is scheduled to be built on the crest of a hill, is urban in nature, and has a population density equal to or greater than the most congested parts of London. It will include units up to five stories high; twice the height of anything in the area. I strongly object to the detrimental effect the proposed development will have on the environment and the various sites of special significance that border it.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/6805  **Respondent:** 15274913 / Simon Osborn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. I urge the council to look more imaginatively at use of brownfield land. For example, much land currently used as retail is likely to become vacant in the years to come.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the building of any homes in this Green Belt area which has a lovely rural character. I live in the London/Surrey borders and often come out here walking. I am a keen birdwatcher and nearby Ockham heath has valuable, protected wildlife such as nightjars. I have been on evening walks on Ockham heath to see nightjars with the Surrey Wildlife Trust. A forward-thinking council would be working with Surrey Wildlife Trust not just to protect surroundings areas from development, but to expand Ockham heath and turn the ‘airfield’ back to heathland as it once was. Already a huge amount of this internationally valuable habitat for wildlife has been lost. An estimated 80% of all the UK's lowland heathland has been destroyed (source: RSPB). This is valuable for wildlife but walking in this lovely area also improves my quality of life, physically and mentally. Surrey needs to protect its countryside as an asset not build new homes in completely inappropriate places. I am also a regular visitor to the Black Swan as our cherished country pub. With this development it would be a ‘country pub’ no longer.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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. It is wholly inappropriate, thought up by a faceless developer who I understand is acting through a Cayman Islands company, removed from public scrutiny. The developer should be ashamed of this way of acting, hiding from the public, which shows that pure profit is their motive. It is greed and the pursuit of short-term profit. If this development is permitted we will only realise the damage that has done after it is too late and the special rural character of this part of Surrey (just about clinging on after the A3 and M25 have been driven through) has been destroyed.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. This is simply not credible. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. This has pollution and climate change impacts. Surely the council has a duty to site major new developments in areas served by public transport?
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object strongly to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). An estimated 80% of all the UK’s lowland heathland has been lost (source: RSPB). Surrey has much of what remains. Ockham/Wisley heaths have already been cut in two by the A3 and M25. It would be extraordinarily destructive to build a huge new housing development next to what remains. The council should be working to enhance what is left. A forward-thinking council would be working with Surrey Wildlife Trust to convert the old airfield back to heathland as it once was.

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

In summary, it is wholly inappropriate to build this size of development on this greenfield, green belt site. I am surprised that this site remains in the strategic plan. To an outsider, it appears to be yet another case of a greedy developer (in this case acting through a Cayman Islands company away from public scrutiny and through cowardly anonymity) bending a council’s ear to persuade the council that short-term financial gain should be placed ahead of a sensible, sustainable...
future for this area that will preserve its character and enhance the life of residents and regular visitors such as myself. I urge the council not just to remove this site but to work with organisations such as Surrey Wildlife Trust and the RSPB to prevent more damage to Surrey heathland and work to restore what has already been destroyed.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7970  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

'Report on Guildford'

<documents attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: PSLPS16/7976  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

116. RPC has had the opportunity to see the Report of Richard Harwood Q.C. prepared for Wisley Action Group. RPC wishes to adopt the views expressed in the Report and accordingly agrees that the allocation is unsound. This report is attached, for reference.

117. Accordingly, RPC objects to the allocation of Land at Wisley Airfield and recommends that the Plan should be modified and the allocation for housing should be deleted in its entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7875  Respondent: 15280737 / Miller Developments (David Milloy)  Agent: The Chine Consultancy Advice Ltd (David Pugh)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

The former airfield at Wisley is identified as a site of Medium Green Belt Sensitivity based on the four purposes of the Green Belt adopted as the assessment criteria in the GBCS. This however down plays the contribution the site makes in terms of ‘openness’ which is one of the principal attributes of any Green Belt.

Although the site is considered to be a previously developed site, the quantum of above ground structures on the site is limited and only they currently impact on the site’s openness; the former runways in fact contribute to its open character. As a consequence, the Green Belt designation of the site is significant to the surrounding settlements and when viewed from the A3 and adjacent local roads. Miller would question therefore whether this site should be seen to be of medium Green Belt Sensitivity.

Whereas RHS Wisley was considered not suitable for insetting due to the contribution it made to the Green Belt (despite the level of development on the RHS site), the opposite conclusion has been reached in relation to Wisley Airfield which is considered to be an appropriate site for a new settlement as it is not part of the Borough that best serves the purposes of the Green Belt. Miller would argue that whilst the site’s development may not constitute ‘urban sprawl’ it clearly and fundamentally represents and incongruous encroachment into the Green Belt and the openness of the countryside. This clearly demonstrates the subjective nature of applying the ‘four purposes’ of the Green Belt as the sole criteria for assessing the impact a potential a development might have on the Green Belt designation was flawed. It is also considered that the impact on the historic setting of Ockham Village and the Conservation Area, due to the separation that exists is inconsistent with how this criterion has been applied elsewhere (e.g. H8 was considered to impact on the Wood Street Village Conservation Area despite the PDAs benefiting from significant separation being maintained).

In addition to the above concerns, Miller would question whether taking direct access off the A3 Ockham Interchange off-slip is appropriate. The current Interchange provides for south bound off and north bound movements only and is deemed totally inadequate for a development of the scale proposed. An earlier proposal to serve 2,500 dwellings on this site considered far more significant improvements to the Ockham Interchange would be necessary to accommodate the development and that an all movements junction. It is considered that without an all movements junction even a development of the scale now envisaged will have a significant adverse effect on the character of the villages of Ripley and Ockham.

In terms of the sustainability analysis undertaken as part of the GBCS, it is noted that the Wisley Airfield site came near to the bottom of the list yet the Council is suggesting that the sustainability of this location can be be improved by enhancing public transport and cycle access along the existing highways to ‘key’ destinations such as Effingham Junction railway station and Horsley railway station and Ripley. It is unclear as to how these improvements could be achieved without impacting on the character of existing rural roads.

Miller considers that whilst the scale of development proposed has a significant critical mass the total lack of any strategic infrastructure and the absence of a workable access solution will add significantly to the cost of delivery of this project and that the improvements to highways infrastructure, which should be delivered in advance of construction (given the highly congested nature of the A3 and A3/M25 junction) will significantly impact on the delivery of housing in this location and any affordable housing contribution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.
• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5544  **Respondent:** 15282625 / Kelly Graves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):**

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

    1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
    2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
    3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
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    6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

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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.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1282  Respondent: 15284769 / Paul Barnwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

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1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

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   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a
proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the site A35 the land at the former Wisley Airfield as the roads are all ready congestion it would only get worse and the 2000 homes are totally inappropriate and unsustainable development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1362  Respondent: 15298849 / Elaine Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY A35: Land at former Wisley Airfield

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East and West Horsley.

It will impact on the sewage system, already at capacity, on the two railway stations where daytime parking is at capacity and on the shops of East and West Horsley where parking is nearing capacity, on the roads/lanes already severely damaged and narrow, on the medical services available and on the wildlife of the area.

Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I object to policy A35

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3212  Respondent: 15298849 / Elaine Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the development of Wisley airfield still being in the Local Plan. GBC gave 14 reasons to reject this application so it should not be in the Local Plan still.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1588</th>
<th>Respondent: 15299041 / Elizabeth Teece</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

1. **I OBJECT** to site A35 Wisley Airfield - 2000 homes that are totally inappropriate and unsustainable development in 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: PSLPS16/1379</th>
<th>Respondent: 15300513 / Paul Worsfold</th>
<th>Agent:</th>
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</table>

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35- for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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.

I object to the detrimental impact on transport, local roads and road I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, 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.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/2388  Respondent:  15300513 / Paul Worsfold  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the plans for Three Farms Meadows in the draft Local Plan for after the initial plan was overwhelmingly rejected by the full GBC planning committee.

It is an unsustainable site identified in all versions of the plan because of the Infrastructure constraints of the site and the physical location.

The railway stations identified in the application are linked to the site by inadequate country roads. There have been a number of serious accidents within 200 meters of the site in the last year with current levels of traffic.

There is nothing in the application that considers the current traffic problems and congestion. EG Painshill junction of A245 and A3. Also the high numbers of cars and coaches visiting the world famous Royal Horticultural Garden Wisley opposite the site seem to have been ignored.

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc). The application suggests that Plough Lane (in a flood plain) and Ockham lane are a possible route for a new public transport service, linking new residents with many of the key services mentioned by the developer (shops, services, station, local hospital, etc). Use by cyclists of local narrow country lane will delay transport further. The applicant puts great weight on sustainable transport, walking and cycling which is ridiculous on narrow, twisting lanes with no footpaths.

There is very little employment available onsite. A majority of residents will have to travel to work. Few will be able find work within a reasonable distance using sustainable transport meaning vehicular forms of will be required

Suggestions that the use of Woking station as a major hub are laughable as the use of Wisely Road running past the RHS garden entrance and over the narrow canal and bridges (single carriageway) is limited to small numbers of vehicles11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

I note that the new plans are increased in area, the south of the site faces the Surrey Hills AONB and will have a negative impact on the vie

I note that the new plans include an additional 3.1 ha from the green belt without any justification . . .
I am a little concerned that the GBC has not explained their reasons for rejecting the original planning application in a timely way.

I am mystified by the transport analysis undertaken by the applicants' consultants. The data seems to contradict the figures supplied in the plans by a Government Transport department to modify Junction 10 to ease what they consider is a highly congested junction.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I note that pollution levels nearby at Junction 10 exceed recommended levels. Building more houses and further motorised transport will exacerbate the problem for current affected residents.

I consider for the reasons listed above and numerous other reasons that this application be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Objections to the continued inclusion in the Guildford Borough Council Proposed Local Plan (June 2016) of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation for the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of FWA/TFM in the draft Local Plan for the following key reasons:

1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.

   The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. FWA/TFM is prime green belt, and was given to the country for an airfield as part of the war effort, based on the promise that the land would be returned to the community after the need for an airfield had passed. This promise has been broken, and no effort has been made to see whether there is a moral or equitable duty to return this land to the existing community.

2) I object to the disproportionate allocation of housing in this particular part of the Plan. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

3) 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 street lights, 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.
4) I object to the detrimental impact on transport, local roads and road I specifically object to:

1. The lack of suitable public transport. The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

2. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

3. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

4. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

5. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

6. The assertion that the development will result in a meaningful shift to cycling and the development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

5) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

6) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. In particular, two schools should not be planned in the FWA/TFM area which is known to have poor air quality, which will only be exacerbated by the planned development.

7) 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. 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.

8) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 9th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Those reasons remain valid, and there are no adequate ways to overcome them.

9) Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

   • I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant the removal of the land from the Metropolitan Green Belt.
     ◦ I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous reports.

   • I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
     ◦ 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
       1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself, too spread out to anticipate a reduced reliance on private cars.
       1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
       1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
       2. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
       1. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction on as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
       2. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
   • I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1419  Respondent: 15314113 / David Tipping  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council draft Local Plan and to the inclusion in the plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings.

I wish to make the following observations

- The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- The plan calls for Ockham, a hamlet of 159 residences to be merged into a development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
• There is lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge. In terms of traffic movement we are already at a standstill.
• Air pollution in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
• Little or no consideration has been given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• In coming forward with this site no consideration has been given to the wildlife, some of which is already endangered.

My Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted. I believe I’m correct in saying no members on that committee were in favour of that application. If that was the case its obvious that any future application would receive the same decision and be turned down, not just on Green Belt grounds but also on the many other problems that exist in relation to this site which I have listed above.

This site should be removed from your Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and have objected to prior planning applications at this location. In addition to the issues raised above relating to Junction 10 of the M25 and the lack of parking at both Horsley and Effingham Junction stations, I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly OBJECT to Policy A35.

I strongly OBJECT to this proposed policy for the reasons detailed in this letter.

a) The proposed development represents a fundamental breach of Metropolitan Green Belt rules:

The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under 'very special circumstances'. GBC's Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: *It has not been demonstrated that the benefits of the proposal amount to very special circumstances* such as to clearly outweigh the harm to the Green Belt and the other harm identified.

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers' previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon 'exceptional circumstances', which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing.

Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a 'first line of defence' against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

Accordingly, I OBJECT to Policy A35 as a fundamental breach of the Metropolitan Green Belt rules.
b) This site does not meet acceptable levels of sustainability:

Sustainability Appraisal is a core concept of planning policy, yet this site is rated very poorly in terms of its sustainability.

The sustainability appraisal undertaken by GBC's consultant, AECOM, is presented in the Local Plan Evidence Base report 'Sustainability Appraisal (SA) of the Guildford Borough Local Plan' issued in June 2016. In their report AECOM have graded all Local Plan policy sites according to 21 different criteria using the conventional 'traffic light' system. Red colouring signifies poor sustainability. Of the six larger sites included in their evaluation, (those with proposed housing numbers of 1000 homes or greater), AECOM rates Site A35 as the very worst of all in terms of its sustainability. No less than 8 out of the 21 criteria are graded as 'Red' by AECOM for this site, more than any other large site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1788  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Detailed reasons why this site has such poor sustainability include the following:

- There is currently no infrastructure whatsoever at this site, meaning that all water, electricity, gas and phone services will need to be newly established;

- New large-scale sewage disposal will be needed, a fact recognised by Thames Water, indicating it may take 3+ years to provide adequate sewage handling facilities for this site;

- There are presently no schools, medical services or shops within walking distance of this site;

- There is presently no local employment at this site and little after the development is completed;

- There will be a significant destruction of agricultural land arising from this development; There will be significant environmental damage from this development;

- There is no public transport currently serving this location;

- The nearest train stations are Horsley and Effingham Junction, both around 3 miles away and so too far to walk. Neither station currently has significant parking capacity available.

- Travel from this site will be primarily dependent upon motor vehicles. Any new site so dependent upon motor vehicles for transport cannot be considered as being 'sustainable';

- New access roads will be needed and significant changes proposed to the surrounding road network, leading to further pressure on over-crowded rural roads and increase in the traffic congestion in nearby settlements;

Whilst some of these issues may be mitigated, e.g. by building new schools, medical facilities, etc, others such as the environmental issues and infrastructure impact may not. This proposal, fundamentally, represents an attempt to create a large-scale new settlement in a poorly-sited green field location. However, as the GBC's own consultant has demonstrated, this site does not reach acceptable minimum levels of sustainability.

Accordingly, I OBJECT to Policy A35 on grounds of its unacceptable sustainability.
c) The site will have a severe impact on local traffic & infrastructure:

The proposed development will have a severe adverse impact on road traffic in the surrounding area. This includes East Horsley where high volumes of additional traffic are likely from the residents of this new settlement accessing East Horsley's two stations, shops and nearby schools. Most of the rural roads in this area are narrow winding 'lanes' - a term used in a recent local public meeting by John Furey, senior SCC councillor for Infrastructure to describe East Horsley's through roads. Many of these 'lanes' are without pavements for large stretches, whilst the principal through-roads of Ockham Road South and Forest Road pass along unlit residential areas so narrow that two buses cannot cross in many sections of these 'lanes'.

The road closures and junction changes being proposed to accompany this development will only serve to increase traffic volumes through the village centres of East Horsley, Cobham and Ripley, and around the station at Effingham Junction, all of which already suffer from traffic congestion at peak hours. The further increase in traffic congestion at the A3-M25 intersection would only exacerbate an existing problem for the highways authority - we understand Highways England have repeatedly expressed serious concerns about this development.

Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel there and back to these stations lacks credibility. Other village facilities in East Horsley, such as the medical centre, are also likely to suffer adversely from a substantial increase in users as a result of this proposed development.

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local infrastructure.

d) There are damaging health & safety implications arising from development at this site:

The site is located close to the junction of the M25 and A3, one of the busiest road junctions in the country. The Nitrous Oxide ('NOx') emissions recorded around this area are extremely high and will affect residents living at the proposed site. The proposal to build new primary and secondary schools at this location is also contrary to government policy prohibiting the building of schools on sites in areas where there is high NOx.

In rejecting the previous planning application by the developers, the GBC Planning Officer cited the "failure to provide adequate information on NOx emissions and nitrogen deposition and to provide any information on acid deposition" as one of the grounds for this rejection.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications.

e) The environmental impact on protected wildlife will be substantial:

GBC's Land Availability Assessment which supports Policy A35 states that the site lies within the 400m-5km 'Zone of Influence' of the Thames Basin Heaths Special Protection Area ('SPA'). This is not correct. The site is immediately adjacent to Ockham & Wisley Commons, an area designated as a Site of Special Scientific Importance ('SSSI'), which forms one part of the Thames Basin Heaths SPA and much of the site lies within the 400m Exclusion Zone where new building is effectively prohibited.

The SPA was set up to provide protection for rare and threatened birdlife in certain lowland heath locations, the provisions of which were agreed by GBC in its 'Thames Basin Heaths SPA Avoidance Strategy'.

This strategy establishes zones to protect the SPA from the impact of new development, particularly from the damage caused by pets (dogs, cats, etc) of local residents to the habitats of threatened ground-nesting birds. Land within 400m of the SPA is designated as an 'Exclusion Zone' where "there will be a presumption against additional new dwellings". Since
the Wisley Airfield site is immediately adjacent to Ockham Common for a significant length, much of this site falls within 400m of the SPA Exclusion Zone.

The remaining portion of this site falls within the 400m - Skm 'Zone of Influence' set out under the SPA policy, which requires developers to contribute a new SANG ('Site of Alternative Natural Greenspace') to mitigate for potential damage caused to the SPA from new development -the size of the SANG is a function of the scale of the development. In their previous planning application the developers proposed that the land within the 400m Exclusion Zone would provide their SANG contribution. If accepted as a SANG, this would only encourage the 5000+ residents of the new settlement to allow their pets access into this space, therefore defeating the objective of the SANG mitigation.

Even with the 400m Exclusion Zone in effect, the positioning of such a large site immediately adjacent to such an important protected space will inevitably have a major detrimental impact on the wildlife within it.

Accordingly, I OBJECT to Policy A35 on grounds of its material adverse environmental impact.

The impact of the Exclusion Zone and SANG requirements, together with the need to provide for the existing waste facility, means that the actual area of land available for housing development at this site is estimated to be around 43 hectares.

f) The development is totally out of keeping with local character, context & distinctiveness:

It is a key element of planning policy that new developments should be in keeping with the established pattern of development in the area. In the 2016 Proposed Submission Local Plan, GBC's very first housing policy, Policy H1, requires that development should: "make the most efficient use of land whilst responding to local character, context and distinctiveness." However, Policy A35 fails to do this.

With its proposal to build some 2,100 homes on and around the site of the former Wisley Airfield, Policy A35 will create a new settlement larger than any other in Guildford Borough, outside Guildford itself. The nearby historic village of Ockham has merely 159 dwellings. It will be completely swamped by a development on such a scale.

Moreover, the design and density of the proposed development will be completely out of context with its surrounding area. Due to the restrictions of the SPA Exclusion Zone, the need for SANG provision and the land needed for the waste facility, the actual land area to be used for housing development under Policy A35 is estimated to be around 43 hectares. Therefore, with 2,100 homes proposed for this site, the overall housing density of the settlement area may be calculated at around 49 dwellings per hectare ('dph').

East Horsley, just three miles from this site, is the largest settlement in Guildford borough outside of Guildford town, with some 1,760 homes. East Horsley presently has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense as the nearest settlement of a comparable size. The proposed development under Policy A35 therefore utterly fails to respond to local context and as such is in breach of GBC's own Housing Policy H1.

The density of 49 dph proposed under Policy A35 is effectively an urban density appropriate for a metropolitan location. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. For a setting within the middle of rural Surrey this is completely out of character.

Other settlements close to this site are small rural villages such as Ockham, West Horsley and Ripley. These villages have grown up organically over a thousand years. They contain many historic, listed or otherwise protected buildings as well as a range of residential housing, predominantly detached two storey houses or bungalows. They are all picturesque villages with charm and character. Visitors come to the area to enjoy some of the prettiest villages and countryside in southern England, all within easy access of London. The character of this whole area would be irreparably destroyed if this development goes ahead.
Accordingly, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context and distinctiveness, and therefore breaches the NPPF and emerging GBC Policy H1.

Concluding remarks

I have major concerns about Policy A35. I consider this proposed policy to be a severe contravention of Metropolitan Green Belt rules. It will result in a new settlement of very low sustainability, it will have a major adverse impact on the infrastructure and environment across a widespread area and it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

Accordingly, I strongly OBJECT to Policy A35.

In the light of the recent referendum outcome, which will result in the UK leaving the EU, it is inevitable that the population and economic projections for Guildford Borough will need to be reduced.

I presume that GBC will in due course be making such reductions to its proposed housing projections to reflect these changed circumstances. In our opinion, the proposed development at former Wisley Airfield ought to be the very first site in the Borough that GBC should remove from its draft Local Plan as a result of the UK now proceeding to leave the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1468  Respondent: 15324673 / Michael Brooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

   • I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

     1. The assertion that the development will result in a meaningful shift to cycling and walki. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

     2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads - there are already significant congestion issues on Old Lane and Effingham Common Road during peak hours - there is no capacity for this

level of increase especially when also considering wide vehicles including increased bus and HGV movements

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1. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as Local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

2. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity with dangerous parking on the verge of Effingham Common Road already a regular occurrence. Any assertion that residents will use other stations in the area is pure fantasy.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. As a father of two young children, this is clearly of much concern. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

After 14 months of consideration (and various extensions and amendments) Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 5th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the Local Plan in so far it includes a proposed large development of housing for Wisley. Such a development will have a huge and unacceptable impact on the other local villages of Ripley, Send and the Horsleys, all of which also have new housing developments in substantial numbers included in the Plan. The proposed building in the local plan of the development on Wisley Airfield will change and spoil the whole character of the area.
• I also object to the removal of the former Wisley Airfield land from the Green Belt in order to facilitate the development of numerous dwellings. The point of the Green Belt is to protect the countryside for the future.
• The proposals for the housing development at Wisley Airfield, plus other proposed housing developments in Ripley, Send and the Horsleys are likely to result in 4,000 - 5,000 additional cars moving in and out of these areas on a daily. This increase in the volume of traffic will result in traffic congestion problems on all the local rural narrow roads. Also local amenities are not sufficient to cope with this influx of people and transport.
• I also object to the local plan’s proposed housing developments in The Horsleys, Send and Ripley which are all building over fields and woodland which will be lost for ever.

I hope you will take note of my objections and particularly the former Wisley Airfield is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1490  Respondent: 15326369 / J D W Todd  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT

Policy A35 p124 and 203

Land at the previous Wisley Airfield like Gosden Hill is close to Send and Ripley and will cause significant traffic flows on the A3 and M25 as well as the effect on local amenities. This would also be catastrophic as regards local hospitals, schools, traffic and the environment.

Overall the increase in the population of Send as already envisaged by developments in the area will impose an intolerable burden in the infrastructure such as Schools, the Villages Medical Centre, Roads, local Hospitals, parking for local shops, sewerage and internet provision (which is barely adequate at present). I see nothing in the Local Plan concerning such issues and until these issues are addressed satisfactorily in detail any further development should be rejected. There would seem to be a hidden agenda and vested interests by some members of the committee being brought to bear on the overall policies being put forward by the planning committee to the detriment of the Send area and its environs which seems to have been singled for intensive development and this is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1496  Respondent: 15326849 / Michael Hoad  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I was born and brought up in Guildford and am still a regular visitor to the Borough, not only to visit many friends, but also to enjoy walking in the countryside and through the historic villages which are the Borough’s heritage.

I would like to raise objections to the Borough Councils proposed Local Plan.

I object to the fact that the majority of housing is proposed to be built on Green Belt land, rather than on available brown field sites, and I specially object to the proposed removal of the former Wisley Airfield site from the Green Belt when no exceptional circumstances have been given for doing so.

I strongly object to the continued inclusion of the Wisley Airfield site in the plan when after over a year of consideration, the Council Planning Committee unanimously rejected the developer’s planning application, after the Council’s Planning Officers expressed grave concerns about the proposed development.

The proposed 2,000+ houses proposed for this site would totally swamp the local historic Ockham village with its many listed houses, whilst losing valuable green land.

The roads in the area are extremely narrow, unlit and with no pavements and totally unsuitable to cope with increased traffic. The suggestion that this development would encourage a move to cycling and walking is not realistic due to the isolation of the site – it would without doubt bring about a large increase in private car usage in the area. Car ownership figures would suggest that a 2,000+ housing development could generate 3,000 - 4,000 extra cars (as well as heavy lorries and vans which would service such an estate) adding to an already overcrowded A3 and M25, and creating even higher levels of pollution, which already breach EU limits around the M25 junction. Furthermore, there is little public transport in the area and certainly neither of the local railway stations at Effingham and Horsley could cope with a large increase in passenger numbers or demand for parking.

A look at the map clearly shows why the Green Belt was created – the urban sprawl from London has already reached as far as Cobham, and the Wisley Airfield site is crucial in protecting the Borough from its further advance.

I trust that you will seriously consider removing the Wisley Airfield site from the Local Plan – not only for the many practical concerns raised, but because it risks destroying the very countryside and rural village life which are the very things which make the Borough such a desirable place to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1520  Respondent: 15327905 / Julia Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. Three Farms Meadow site

I OBJECT to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1523   Respondent: 15328193 / Felicity Ashfield   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My objections to Guildford Borough Council Proposed Local Plan i june 2016) and to the continued inclusion in the plan of the Former Wisley Airfield now known as Three Farm Meadows- Allocation A35 - the phased development of a new settlement of up to 2100 dwellings.

I very strongly object to the draft local plan for many reasons - and I wonder if any of the Councillors have really considered this proposal, and many others in the neighbourhood - Over 600 houses in Horsleys, 400 in Burnt Common, 2000 houses on Gosden Hill Farm (Burpham) plus a number of smaller sites in nearby villages. These add up to in excess of 5000 new dwellings in this neighbourhood.

As far as I am aware no Councillor or Planning Officer has ever been to or considered the enormous effect that this would have, not only on the residents in these areas but many other people from far and wide. I wonder if the Councillors or Planning Officers even know where these places are and, possibly as they do not live near the area effected, they feel that they are correct in putting these plans forward (NIM BY/SM).

If these building projects were carried out then there would be total traffic gridlock not only in the local area but on the M25 and A3 and, of course on every one of the smaller roads in Surrey and the surrounding Counties.

Amongst my other objections to the draft local plan, where no consideration has been given, are:

  • There are not sufficient Transport links (railways, buses or roads)
  • There are not sufficient Schools/Academies to educate possibly up to 10,000 children in the area. There are insufficient shopping and parking facilities
  • The roads in the area cannot take any increase in traffic as this contribute to grave danger to all users (car drivers, pedestrians and cyclists, etc)
  • The air pollution is already at a high level and any increase caused would be well in excess of the legal level.
  • I was under the impression that the Councillors had previously stated in their Manifesto that "the Green belt is safe" It now appears that these words were totally meaningless and untrustworthy.
  • Councillors and planning officials have no right nor lawful reason to turn prime Greenfield land into an enormous urban sprawl/slum stretching from Greater London to Guildford and probably further out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1542   Respondent: 15330017 / Honor Grear   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to the continued inclusion in the Guildford Borough Council Proposed Local Plan (June 2016) of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of FWA/TFM in the draft Local Plan for the following key reasons:

1. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt FWA/TFM is prime green belt, and was given to the country for an airfield as part of the war effort, based on the promise that the land would be returned to the community after the need for an airfield had passed. This promise has been broken, and no effort has been made to see whether there is a moral or equitable duty to return this land to the existing community.

2. I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

3. 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 street lights, 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.

4. I object to the detrimental impact on transport, local roads and road I specifically object to:
   a) The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b) The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c) The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d) The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e) The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f) The lack of suitable public transport The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

5. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

6. I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames
Basin Heaths SPA and the irreversible impact of the habitat degradation. In particular, two schools should not be planned in the FWA/TFM area which is known to have poor air quality, which will only be exacerbated by the planned development.

7. 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. 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.

8. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 9th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Those reasons remain valid, and there are no adequate ways to overcome them.

9. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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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<th>Respondent:</th>
<th>15330017 / Honor Grear</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

12. Opportunity (3) should be common to all sites and is not unique to this site

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

16. I object to the removal of additional 3.1 ha from the green belt without any justification

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. Indeed, in ordinary words and common language, I believe that this draft local plan, and these revisions, in totality, but in particular relating to Three Farm Meadows are “bonkers”!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites (June 2016) and to the continued inclusion on the plan of the former Wisley Airfield, now known as Three Farm Meadows (TFM) - Allocation A35 or the phased development of a new settlement of 2,068 dwellings.

Although I live outside the borough I use the borough for visiting friends who do live there. I object to the Local Plan for the following key reasons:

1. I object to the threat the local plan poses to the historic rural village of Ockham and the blight on properties there.

2. I object to the detrimental impact the proposed development of over 2,000 dwellings will have on a village with 159 residences. In particular this development and the associated increase in traffic will have a very detrimental impact on the environment, road safety and congestion.

3. I object to a plan which proposes that over 70% of new houses are built on land designated as Green Belt land in contrast to election manifesto promises made to the electorate.

I trust that these objections to the Local Plan will be fully considered and that the plans for development on the former Wisley Airfield (TFM) allocation A35 are now removed from the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPS16/6393  Respondent: 15342113 / Jane Carwardine  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the building of 2000 house on the Wisley airfield. I previously thought it might be a reasonable proposal to build on an old brownfield site but the scale of the plan will have an enormous impact on our narrow country roads and make train travel at peak times intolerable. It is almost at capacity already and where will the extra cars park?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Attached documents:

### Comment ID: PSLPS16/1649  Respondent: 15342689 / Robin Pearson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I refer to the above Plan and the proposal to build approximately 2,000 houses on the site of the former Wisley Airfield.

I wish to strongly object to this proposal on the basis of creating the equivalent of a new town on Green Belt land. Government Policy states that the use of Green Belt land can only be used in exceptional circumstances and this certainly has not been demonstrated.

If considered, this proposal would have a major impact on the villages of West and East Horsley. This forced growth policy would put an enormous strain on existing infrastructure in an already over-crowded area. Our roads, or lanes, are worn out, the existing sewers and drainage systems have difficulty coping. Our schools are overcrowded, our Doctor's surgeries struggle to cope and our few shops have limited parking. The nearest stations would be Horsley and Effingham Junction and they are both well served and their car parks are full.

It must remain a Policy to preserve the natural beauty of our area and to build houses and create a new town in such a rural area would be negligent, and therefore to this end I must strongly object.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Attached documents:

### Comment ID: PSLPS16/1671  Respondent: 15344001 / Alex Paton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the building of 2000 house on the Wisley airfield. I previously thought it might be a reasonable proposal to build on an old brownfield site but the scale of the plan will have an enormous impact on our narrow country roads and make train travel at peak times intolerable. It is almost at capacity already and where will the extra cars park?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### Attached documents:
I am writing with regards to the building proposals for the Horsleys and Wisley Airfield/Ockham and my objections to them.

My reasons for doing so are the following:

**Wisley Airfield**

I object to the development of 2000 extra houses being built. The local roads and public transport at peak times are already at capacity. The A3 being the closest main road in and out of London is already regularly congested, if not at a standstill in both directions during rush hours, as is the A25 that connects the area with Guildford. The winding country back roads are also certainly not made for large numbers of cars. Adding more traffic to the area will not only make this undoubtedly worse, but will also increase pollution and disrupt more wildlife around the greenbelt area.

The trains are also at peak time capacity. The car park at Effingham Junction (the closest station to the suggested site for building) is already full daily, with commuters parking dangerously and most probably illegally on nearby roads. The trains themselves are full already. The villages are not places that attract many work opportunities (nor should they become so), so residents of the proposed establishments would need to travel to work in some capacity.

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:

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**Comment ID:** PSLPS16/1781  **Respondent:** 15348481 / Donna Styles  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. I OBJECT TO – to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt – Site A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1784  **Respondent:** 15348641 / Clare Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst I support the concept of using the Wisley Airfield Site for development I am not convinced that such a large settlement is warranted.

It is a major anxiety that the development will impact on local roads which are already extremely busy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1786  **Respondent:** 15348705 / Richard Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The draft Local Plan also proposes development of 2000 houses at the Wisley Airfield. This would be an unsustainable development that would depend heavily on private car transport, exacerbate safety concerns and congestion on the A3/M25 interchange and add significantly to the problems described above in the Horsleys.

This is an ill-considered Plan that should not be approved.
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys - of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC.

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   a. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
b. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and a further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport options. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously- air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. 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 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.

4. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows)- where the planning application has already been unanimously rejected by GBC’s Planning Officers, who cited the same grave concerns highlighted in this letter.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I write to **OBJECT** to **Amended planning application 15/P/00012** for the following reasons:

**Sustainability:** The site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which are already running over capacity.

- The application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit.
- There is no spare parking capacity at either of the local stations.
- Sites of this size are required to provide outdoor open space. The applicant has “double counted” the outdoor space with that required for SANGS
- The loss of high quality agricultural land is in contravention of policy.

**Air quality:** The air quality figures are based on an unreliable transport assessment.

- The applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source)
- Poor air quality is exacerbated in the area by temperature inversions which trap the air. Young and old are extremely susceptible to poor air quality.
- Air quality is not improving as fast as expected, partly due to the excessive emissions (VW et al)
- The impact of poor air quality on RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area (SPA) is already in excess of legal limits.

**Transport:** The transport assessment makes a number of erroneous assumptions and is not credible.

- It is completely unrealistic to assume that there will be a decrease in vehicle movements.
- There is no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children will have to be transported to the nearest available school in Leatherhead – adding to congestion.
- There appears to be no impact shown for the 270 daily bus movements or for the waste lorries or HGV deliveries to the site.
- The TRICS data used for comparison is not a relevant measure: site not comparable with a site in Guildford, nor a site 400m from the centre of Redhill, nor one on the edge of Staines.
- The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.
- The modelling in the Transport Assessment at 7 junctions close to the site bear no relationship to the daily experience of residents, evidencing flawed modelling
- The number of daily trips is understated in the region of 1000 vehicle movements.
- Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham/ Ripley/Downside and further afield.
- If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those needed by the RHS

**Appropriate development:** The site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the TBHSPA and the M25 to the north and the Conservation area of Ockham Village to the south.
- Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances which have not been demonstrated

- The site is not big enough to provide satisfactory living standards even for “affordable housing”.

- Four and five storey buildings are not appropriate in the rural environment nor on an elevated site.

- Residents will be cramped in with little outdoor space, a noisy location, with very poor air quality. The density of housing proposed is similar to that in Islington.

- The site is clearly visible from the Surrey Hills AONB and as a result it will have a negative impact on views to and from the AONB.

**Thames Basin Heath SPA/SSSI/SNCI**: The impact of 2,068 houses on the environmentally sensitive TBHSPA cannot be mitigated. Damage will occur to the habitats of the protected and endangered rare species (including skylarks, nightjars and many others on the RSPB red list) in contravention of the EU Birds Directives and Habitats Regulations

- The siting of the proposed Suitable Alternative Natural Green Space (SANG) adjacent to the SPA will only increase visitor numbers causing further damage

- Part of the SANG is in a designated flood plain

- Para 119 of the NPPF “presumption in favour of sustainable development” does not apply where development requires assessment under the Birds or Habitat Directives

- It is impossible to state without doubt that the mitigation proposed will prevent damage to the SPA particularly in the light of inadequate traffic/air quality reports.

- There are likely to be over 700 dogs and 700 cats living on the proposed development. These will be a constant threat to ground nesting birds on the SPA and cannot be mitigated by one warden working a normal working day.

**Impact on the local area**: The additional 5,000 residents is the equivalent of almost doubling the population of East and West Horsley combined. This increase in local population will impact:

- Light pollution, noise, traffic and infrastructure which has been gravely underestimated and proposed mitigation measures are totally inadequate

- The cumulative development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge per the objections from both Elmbridge Borough Council and Woking BC

- The water table and flooding in the area. It appears that no impact assessment has been done relating to the loss of agricultural land which currently soaks up a significant volume of rainwater.

- Listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm

- Via closure of a number of local roads coupled with an increase in traffic will affect a large number of road users from Cranleigh to Cobham and everywhere in between

**Inaccuracy of the documentation**: There are factual errors in the documentation

- Highways England have recommended that the proposal cannot be determined due to the applicants failure to provide traffic data in the format required

- There are a number of misrepresentations in the paperwork e.g. nine stations within 5 miles – this is however “as the crow flies” only Horsley and Effingham Junction are within 5 miles by usable road from the middle of the development
- The applicant’s description of the site as brownfield is a gross over-simplification. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remaining runway, a habitat for rare flora and fauna, (14ha) has never had buildings. The remainder of the site (55%) is high quality agricultural land.

Other: This site is not deliverable within 5 years due to problems with sewerage and water capacity, outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

- No very special or exceptional circumstances exist - Alternative sites exist
- The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan
- The site is not listed for development under the existing 2003 Local Plan
- There is not enough land to provide a sustainable community based on GBC’s own parameters
- There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

I trust the Council will find this useful, in their deliberations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. A development of this size at Wisley Airfield would have an enormous impact on neighbouring villages, including Ockham, Effingham and the Horsleys. The facilities in these villages will inevitably be swamped by such a large increase in population at the proposed site.

1. The road management plans for the Wisley site appear totally inadequate and unsafe. The traffic leaving/joining the A3 at the Ockham roundabout will create an extremely dangerous situation and we are sure that GBC and the developers would not wish to be responsible for the injuries and deaths that will undoubtedly follow from the development of this site.

1. Air quality has not been taken seriously and pollution in this area is in excess of EU permitted levels and will only get worse if this development proceeds.

For the reasons given above I object to this site being included in the Local Plan and request that it is removed forthwith.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1825  
Respondent: 15350145 / J H Copsey  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites (June 2016) and to the continued inclusion on the plan of the former Airfield, now known as Three Farm Meadows (TFM) - Allocation for the phased development of a new settlement of 2,068 dwellings.

Although I live outside the borough I use the borough for visiting friends who do live there. I object to the Local Plan for the following key reasons:

1. I object to the threat the local plan poses to the historic rural village of Ockham and the blight on properties there.

1. I object to the detrimental impact the proposed development of over 2,000 dwellings will have on a village with 159-residences. In particular this development and the associated increase in traffic will have a very detrimental impact on the environment, road safety and congestion.

1. I object to a plan which proposes that over 70% of new houses are built on land designated as Green Belt land in contrast to election manifesto promises made to the electorate.

I trust that these objections to the Local Plan will be fully considered and that the plans for development on the former Wisley Airfield (TFM) allocation A35 are now removed from the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1846  
Respondent: 15350753 / Linda Bassett  
Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the removal from the Green Belt of the former Wisley Airfield, referred to as Three Farm Meadows, and I OBJECT to Allocation A35, the development of a new settlement of up to 2,100 dwellings, as a new settlement does not accord with the designation of the site as Green Belt and the Council has failed to provide the exceptional circumstances required by the NPPF necessary to justify removal of the site from the Green Belt. It was accepted by the Leader of the Council at the Advisory Board in April 2016 that the Objectively Assessed Needs (OAN) figure was exceeded. There is no need for the Council to exceed its OAN but the Local Plan proposes to do so by causing harm. The OAN can be satisfied by development of more sustainable sites; there is no need for A35 and so there cannot be any exceptional circumstances justifying it.

Green Belt

The Green Belt designation of the site prevents the sprawl of the urban areas of Guildford, Woking, Leatherhead and the Metropolitan area. Previously developed parts of the site such as the runway, taxiways and the aircraft hardstanding are all open and, therefore, buildings on these areas will cause considerable harm to openness and the Green Belt. A new settlement would represent inappropriate development in the Green Belt, would cause significant harm to the character of the surrounding area and significant harm to the setting of a Listed Building. Development of this Green Belt site will discourage urban regeneration.

Sustainability

The Former Wisley Airfield is within the least accessible part of Guildford Borough, remote from rail stations with poor local roads and lengthy bus routes and, given the proximity of the A3, it is implausible that development would be prove to be attractive and safe for cyclists. The development is too small to be self-sustaining and yet large enough to cause substantial adverse impact.

 Deliverability

The site was subject of a recent planning application for a quantum of development comparable to that in the Proposed Submission Local Plan and with a very similar boundary. The application was recommended for refusal and refused unanimously in April 2016. Despite 15 months of negotiation with the applicant, Wisley Property Investment Ltd (WPIL), additional issues of impact on the Special Protection Area (SPA), impacts on the strategic and local highways network, sustainable transport, affordable housing, air quality and education could not be resolved. The failure of the planning application confirms that there is no reasonable prospect that the project can be delivered.

Soundness

The reasons for refusal of the planning application submitted by WPIL and the failure of the applicant to resolve issues for a proposed development comparable to the Local Plan allocation confirm that the allocation is unsound. The allocation i) does not provide sustainable development ii) is not supported by exceptional circumstances to justify removal of the Green Belt designation and iii) lacks realistic prospects of delivery.

I OBJECT to the removal of East Horsley and West Horsley from the Green Belt. The NPPF requires the provision of exceptional circumstances to justify alteration of the Green Belt Boundary. The Council has failed to provide the necessary justification. Therefore, allocations A36 Hotel at Guildford Road East Horsley, A37 land at the rear of Bell and Colvill Epsom Road West Horsley, A38 land west of West Horsley, A39 land near Horsley railway station Ockham.
Road North West Horsley, A40 land north West Horsley and A41 land south of West Horsley should be deleted as allocations for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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2. Wisley Airfield.

I object to the building of 2000 house on the Wisley airfield. The case for so much additional local housing is not made. The pressures from additional nearby homes, people and dogs will jeopardise conservation efforts to preserve a rare habitat for nature at Ockham Heath. The narrow feeder roads will struggle to cope with additional traffic and there will be increased congestion at junctions to nearby main roads. In combination with the other planned developments in the Horsleys, the Wisley site development will create a large block of suburbia in what was previously a mixed semi-rural community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT TO site A35 Wisley airfield. The development of 2000 homes are unsustainable and totally inappropriate in the Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The proposals for Wisley airfield falls exactly into this category...GBC are trying to justify the development under unfulfilled housing need (which has been exaggerated at best) and in any case unfulfilled housing need is not sufficient argument to build on green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1883  Respondent: 15353633 / Neal Stone  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I OBJECT to Policy A35: the proposed Wisley Airfield development which is completely out of keeping with the will add tremendous burden onto all local services. Only a small proportion of the site is brownfield (not totally as stated). It will add traffic to the already busy M25/J10/A3 junction. The number of houses suggested will ruin Ockham conservation area. The development would have a major negative impact on Horsleys facilities such as shops, trains, health centre etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1919  Respondent: 15355361 / Jennifer Brockless  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to register my strong objection to the New draft Local Plan.

I cannot understand why, after the GBC Planning Committee unanimously rejected the proposal for 2,000 homes (mostly on the site of the former Wisley Airfield), it has again been included in the plan; an explanation of this repeated inclusion should be made public in conjunction with clarification of the new reasons that justify it.

Much of this development would be adjacent to the Nature Reserves of Wisley and Ockham Commons and Chatley Heath. Substantial parts of this land have SSSI designations and development adjacent to such is forbidden under Natural England's Wildlife and Countryside Act 1981 and Access to the Countryside Act 1949 - amended by schedule 11 Natural Environmental and Rural Committees Act 2006. You need to make public the proposed and actual consultations that you have had (and intend to have) with Natural England regarding the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1365  Respondent: 15355361 / Jennifer Brockless  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposal to increase the size of the site for development will lead to even greater numbers of vehicles on roads which are not designed for even the present volume of traffic. The delays around the M25 Junction 10 slip roads have recently led to long build-ups on the A3 so how on earth will the present infrastructure cope with such a vast development of housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1923  Respondent: 1535553 / Susan Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have lived in Hatchford since my marriage in 1959. I wish to add my name to list of objections who state that Allocation A35 Former Wisley Airfield be removed from the local plan.

I object to more houses being built on this site now named three farms meadow. The narrow winding lanes are not suitable for an increase of vehicles. It is too dangerous now for me to walk 200yards to post a letter at the Black Swan public house post box. I have to drive for my own safety.

I object to more traffic causing the air quality to further break the EU permitted levels.

I object to loss of Green Belt land. My husband and I are great nature lovers and wakl through the woods almost daily on public rights of way!

I object to Guildford Borough Council proposed local plan (June 2016) and to continued inclusion in the plan of the former Wisley Airfield now know as Three Farm Meadows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1933  Respondent: 15356385 / Mervyn Plumtree  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to site A35 Wisley Airfield- 2000 homes that are totally inappropriate and unsustainable development in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield FWA, now known as Three Farms Meadows TFM Allocation A 35 for the phased development of a new settlement of up to 2100 dwellings

I STRONGLY OBJECT to the draft Local Plan for the flowing reasons:

1. I object to 70% of new housing planned on green belt when there is ample brownfield in urban areas

2. I VERY STRONGLY OBJECT to the removal of the former Wisley Airfield site from the Greenbelt land the site is needed to protect against an urban corridor from London

3. I OBJECT STRONGLY to the disproportionate allocation in this part the borough.

The impact on the narrow roads around the villages of Ockham, Ripley, Wisley, Horsley and others will be detrimental to health due to heavy pollution levels from the A3/M 25 junction, light pollution and general impact of heavy traffic down narrow beautiful country lanes.

1. I STRONGLY OBJECT to A proposed development of over 2,000 houses would result in more than 4,000 cars, heavy lorries and buses for proposed schools, chaos at the station of Horsley and Effingham, impact on village life, cafes and public houses and local amenities.

Chaos at the Ripley roundabout.

1. I STRONGLY OBJECT ......My main concern, viewed with complete amazement and horror is the inclusion of the Wisley Air Field (three Farms Meadow) in the Local Plan I was at the meeting when EVERY COUNCILLOR to a MAN objected and refused permission!!!!!!

WHY therefore has it been included? Whose suggestion was that?

I need answers please.

All the authorities represented refused permission for the right reasons as the whole proposed development for the airfield is preposterous and the impact would be felt for years to come. To the detriment of all who live in the local area and the people yet to come.

Therefore in conclusion I demand that the Wisley Airfield is withdrawn from the local plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I understood that the development at the old Wisley Airfield site had been rejected but has been included on the above plan again. The density of the proposed development here is not appropriate for the area and must continue to be rejected by the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

5) Development of over 2000 house village at Ockham (former Wisley Airfield).

The impact on the Horsley villages of such a huge mixed housing, retail, commercial traveller, and schools development less than 2 miles distant from the Horsleys would be enormous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

DRAFT LOCAL PLAN – CONSULTATION

Wisley Airfield – Site A35

This letter addresses the proposals contained in June 2016 Guildford BC Draft Local Plan for 2013-31 for substantial extra housing across the Borough, and particularly at Wisley Airfield close to my home.
In conjunction with my husband, I OBJECT to this ridiculous proposal to begin an unsustainable wedge of development between London & Guildford which will be uncontrollable in the future through the precedent set by this Plan, and support all his comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2203  Respondent: 15373153 / C R Woodland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to site A35 Wisley Airfield. The proposed development is totally inappropriate and a more suitable use for the site would be as a park-and-ride 'hub' with buses going to Guildford, Woking (via Send), Heathrow and Gatwick Airports and possibly other places such as Effingham Junction as well. Tilis would reduce traffic flows on the M25, A3 and other local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4755  Respondent: 15377473 / Deborah Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. A35

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

- The assertion that the development will result in a meaningful shift to cycling
- The increased volume of car traffic. A proposed development of 2,068 homes
- The congestion this traffic will cause on the narrow rural roads in Ockham and
- The danger this traffic will be to local cyclists and pedestrians, due to the
- The increase in the already severe congestion on the Strategic Road Network
The lack of suitable public transport. The local rail stations of Effingham and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars would result in an estimated 4,000 additional cars on the roads on the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

The absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

The A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5876</th>
<th>Respondent: 15380289 / Stephen Hewlett</th>
<th>Agent:</th>
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</table>
My Self & My 97 yr old Father contact You to "OBJECT" in the strongest possible terms to the LOCAL PLAN in its entirety & also to "OBJECT" in the strongest possible terms to the inclusion of the "FORMER WISLEY AIRFIELD" as a strategic site in particular in the plan. It should be WITHDRAWN AT ONCE & WITHOUT QUESTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2796  **Respondent:** 15380289 / Stephen Hewlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I continue to "OBJECT" in the strongest possible terms that policy A35 THREE FARM MEADOWS are still included in the DRAFT LOCAL PLAN. for many and various reasons and these include:-

1. It is an unsustainable site in whatever version it has been presented.
2. Unrealistic distance from existing railway stations. all other identified sites are closer.
3. The site is in touching distance of (J10) M.25. – A.3. the most gridlocked junction in Surrey and one of the most congested in the Country.
4. Local roads are full to overload now already!! and worsened by road works etc.
5. Small local roads and lanes unsuitable and unsafe for public transport with frequent delays.
6. narrow dangerous road to HORSLEY very hazardous to pedestrians cyclists etc.
7. nearby R.H.S. WISLEY is the most visited Tourist attraction in S.E. where attendance numbers expect to rise to 500,000/annum this [illegible word] and other high attendance events at R.H.S. have not been taken in to consideration
8. The increase in traffic expected by local employment will be down-right dangerous on these narrow roads and lanes.
9. Commuter traffic to Woking Railway Station at present hazardous will become even more so.
10. The future timescale at the VOR Beacon is unclear and at present is at present a constraint on any possible building height etc.
11. Heritage asset UPTON FARM now abuts the site with a negative impact.
12. The increased area of this site presents a negative view to SURREY HILLS (AONB.)
13. Incorrect changes to site boundaries that are also not identified properly.
14. Changes to Green Belt boundary at the eastern end now encloses site of high archaeological impact
15. Unsuitable proposed development in flood zones 2-3.
16. Failure to recognize the impact on local countryside of new Buildings!!
17. Why has the Council failed to remove this site from the “LOCAL PLAN” despite receiving 1000s of letters of “OBJECTION” from local residents and statutory local consultees!!!
18. There is no mention of the inclusion of A35 on the effect on sewerage capacity.
19. Poor air quality is a real problem in this area that has not been addressed in fact one of the “AIR QUALITY SENSORS” has gone missing mysteriously in recent times!!
20. The Council has paid no heed to the constraints of the GREEN BELT. infrastructure damage.
21. There seems to be no regard to the bad affects of pollution, nitrogen deposition.
22. The Council has in general paid little attention to the genuine fears and concerns of local residents, and so many experts opinions whos views they do not agree with. In short they appear to be on the side of anybody except the local residents they are supposed to represent and defend

In conclusion for the afore mentioned reasons and many others this plan is wrong in so many way’s and is a total waste of time and money.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPS16/2282</th>
<th>Respondent: 15383041 / Danielle Forrest</th>
<th>Agent:</th>
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I OBJECT to the draft Local Plan for the following reasons:

I feel quite strongly that I want to keep our local Green Belt land. We are very lucky to live in an area that is so beautiful with gorgeous views. I have not heard that there are any exceptional circumstances for this to be ruined. It is not only for myself but for any children I might have. Planting a few trees won't re-create an interrupted landscape and importantly all this development would cause many rare and protected species to die.

I love Ockham the way it is. I don't want to be selfish though and say we shouldn't build any more houses or make room for any more people to move from London and come to the outskirts of Guildford - but to do so there needs to be a train station close by. I have seen how full Horsley and Effingham stations are. None of the local stations are within walking distance for anyone so this means an inordinate amount of extra cars on our little lanes.

Anyway, I appreciate the old Airfield is a large area and probably something has to happen to it at some point but it definitely shouldn't be included as a potential site for a large scale residential housing development because a) it is green belt land and b) our Ockham/Horsley area couldn't cope.

I hope you will give my objections your full consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2285</th>
<th>Respondent: 15383169 / Henry Forrest</th>
<th>Agent:</th>
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I OBJECT to the draft Local Plan for the following reasons:

The reasons are: that the proposal is an enormous encroachment on the Green Belt and will change the way our nearby countryside looks for myself and for future generations. (By the way, I thought Green Belt land was "Sacrosanct" and at the very least - an absolute last resort. I haven't seen any paperwork that this is the case.

Apart from my parents moving me away from what I love about Ockham my biggest concern is that if over 2,000 houses were built this probably means over 5,000 people. I don't know how many extra cars that will be but I do know that my
Mum and Dad are always stuck in traffic already. Lots of the roads around here are single lane - I cannot see how they can be made bigger without knocking existing houses down.

We live in Ockham itself so we can't walk home from the station and need our parents to pick us up. I am told that there are no plans to build a new railway station. So how are all the people going to get to work? Horsley and Effingham stations are already super-busy and there could be loads and loads of cars on our narrow lanes. Have the people who carried out this research to put this site in the plan not seen all the local roads closed and us diverted when we have heavy rainfall!

Anyway, I will keep my objection letter brief and to the point - a strong "no" to our village being included for a large scale housing development. The village couldn't cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2326  Respondent: 15385281 / Daniel Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy A35 Wisley Airfield, 2,000 houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2336  Respondent: 15385633 / Pauline Scholey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too hi This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC)
• 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.

• I object to the detrimental impact on transport, local roads and road. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on the 8th April 2016 on the recommendation of GBC planning officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2337  Respondent: 15385857 / Bruce Hooper  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My reasons for objection:

• Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

• Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.

• The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times. Cobham is unable to cope with the traffic at the moment.

• Object to the massive increase in air pollution that would result from the congestion on the small country lanes and the M25 and A3. These areas pollution levels are already above EU permitted levels.

• I live off Between Streets in Cobham and would be affected by the increase in traffic from the above. I can hardly get out of my drive as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2662  Respondent: 15389025 / Keith Cogan  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and again produce congestion on the A3 and surrounding roads including Send. The local infrastructure is completely inadequate to deal with the proposed housing levels. These are massive areas of lovely countryside and protected Green Belt that is just being turned into urban areas. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2386  Respondent: 15389409 / David Votier  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Airfield in the proposed Local Plan. Although I do not live in the borough the airfield is sufficiently close to my home to present substantial problems to my area if any development of the airfield such as that proposed were to go ahead.

Apart from being in the protected Green Belt, and part of it being a SSSI, the previously-proposed development of this site was comprehensively rejected by your Planning Committee on substantial and compelling grounds of which you are surely aware. The site is surrounded by small and historic villages, the character of which will be fundamentally and unacceptably changed by any development. The possibility of over 2000 new dwellings on the site, some of which would be of the multi-storey variety, together with perhaps an additional 3-4000 cars, would totally ruin the area. Apart from the A3 and M25 roads, which are constantly jammed at peak periods, none of the roads adjacent Wisley Airfield is able to take more traffic than at present. They are all narrow, twisting and without pavements. The additional traffic would represent a nightmare.

Furthermore, even if the additional traffic managed to get to any of the neighbouring stations, e.g. Horsley, Effingham, Cobham, the trains could not cope.

The local shops also could not cope. It is fanciful to suggest that shops and other amenities would be available at the site from the outset. No developer would provide such things until after a substantial number of dwellings had been built.

The area surrounding the site is a beautiful part of the county and well recognised as such. So long as Wisley Airfield remains in the Local Plan, thus signalling to developers that they should keep trying, it will be a blight on us all.

I therefore object in the strongest possible terms to the proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The area surrounding the site is a beautiful part of the county and well recognised as such. So long as Wisley Airfield remains in the Local Plan, thus signalling to developers that they should keep trying, it will be a blight on us all.

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. How can land be identified as Green Belt ie: protected and then ‘unprotected’ like this – it is a mockery of the whole concept of protection!

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is simply too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Commuters going to Effingham station are NOT going to cycle or walk!

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. These are small lanes which don’t have the capacity to take this sort of traffic.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The increase in traffic will create a danger to those who do cycle (and pedestrians walking to the woods with their dogs), due to the absence of any cycling paths and the lack of pedestrian footpaths (as there is no space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. Where are all these extra commuters going to park? This will lead to further development of common land which is again ‘protected’.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, which is already in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact 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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I simply fail to see how the local planning committee can be even reconsidering this application with so many people objecting.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to register my objection to the above proposed development on the grounds listed below. Whilst I live outside the borough of Guildford the proposed development will impact the local area in and around Cobham.

- Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- Object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- Object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- Object to the potential harmful impact on transport, local roads and road safety by the suggested development.
- The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- Object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- Object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.
• Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2436  Respondent: 15391329 / Marian Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy A35 Wisley Airfield, 2,000 houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2437  Respondent: 15391585 / Ann Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield, now known as Three Farms Meadows (TFM)

-Allocation for the phased development of a new settlement of 2,068 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored

• I object to the removal of The Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, 36% of the Plan's new housing is proposed in the northeast of the borough (x% of which is allocated to TFM), an area that at present has only 11% of existing housing

1. S) I object to the loss of the historic rural village of 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 stories high and a population density higher than most London boroughs

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to assume a reduced reliance on private cars

  1. The increased volume of car A proposed development of 2,068 homes would indicate an increase of approximately 4,000 additional cars on the roads.
  2. The impact this traffic will have on the narrow rural roads in Ockham and the surrounding areas, also including increased bus and lorry movements
  3. The impact this traffic will have on local cyclists and pedestrians, due to the absence of any cycling paths and the lack of proper pedestrian footpaths (and the space to provide them)
  4. The impact on the already congested Strategic Road Network on the A3 and A further planning application at RHS Wisley (with increased visitor traffic) and a proposed 600 pupil secondary school would add further congestion at the M25/A3 junction as well as local roads. Infrastructure enhancements to the A3 and M25 would have to be completed before any development commences.

Highways England has stated that they have no plans to even consider improving the A3 before 2020.

  1. The lack of suitable public transport. The local rail stations of Effingham and West Horsley cannot cope with the proposed increase in passenger traffic

   - I object to the fact that insufficient consideration has been given to the site's value from an environmental and ecological standpoint, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest (SSSI) and Special Nature Conservation Interest (SNCI)
   - I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents
   - I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced throughout Ockham Parish. 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% both wish to see the historic features of the village maintained and to protect the village's green spaces, including the FWA/TFM
   - Lastly, I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**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>pslp172/5068</th>
<th>Respondent:</th>
<th>15391585 / Ann Watson</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</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? ( )

### Strategic Sites for Development

One, if not the, prime example of the above defects and contradictions is the over heavy focus on developments in the north east of the Borough, and most particularly the continued inclusion of the former Wisley airfield (FWA but known locally as Three Farms Meadows) as a strategic site for development when it is patently unsuited to such designation.

#### The FWA:

- (a) is at the epicentre of the Metropolitan Green Belt to the south west of London and should remain Green Belt.
- (b) contains and is bordered by the Thames Basin Heaths SPA and numerous SSCIs, etc;
- (c) is completely surrounded and constrained on the north by the A3 (one of the most congested A roads in the UK), and to the west, east and south by narrow, unlit, non-pavemented, twisting rural lanes (Ockham Road North, Old Lane and Ockham Lane) which can barely cope with local access needs;
- (d) is immediately adjacent to the A3/M25 junction (one of the most congested and polluted junctions in the UK);
- (e) has no existing infrastructure;
- (f) [has the area of only two average sized UK farms and] could only be developed as envisaged by the Updated Plan through extremely and totally inappropriate high density, high rise buildings, etc.
- (g) produces run off which floods the surrounding area;
- (h) is two miles from a rail line with small existing rail stations which are already at capacity in terms of car parking, near capacity in terms of existing passenger traffic, and over capacity with organic growth in the area, leaving aside proposed developments to the east, west, north and south of the line;
- (i) has no existing bus services which are in any event inhibited by the narrow and twisting roads.
- (j) is distant from existing centres of employment, services, schools, and shops;
- (k) is at the centre of Ockham Parish whose assets are small hamlets surrounded by open attractive country side, recreation opportunities, agriculture and rural pursuits, conservation areas, a cherished history and historic buildings;
- (l) could only be "sustainable" through major and unsustainable if not impractical development in the surrounding area - major additional roads, houses, schools, transport, public and private services, etc, - and the consequential absorption of further Green Belt and greenfield sites as well as the demolition of existing houses and other buildings to accommodate such facilities and access thereto. This fact seems to be gaining growing recognition in the Updated Plan which now envisages concepts such as "District" and "Local Centres", "Locally Significant Employment Sites" "Transport Hubs/Interchanges", etc - concepts which in this context appear to be simply euphemisms for development "creep".

In similar vein, it is noted that the Updated Plan now unacceptably and without explanation includes within the claimed strategic site for development a significant area of land to the south of the FWA directly bordering the Ockham Conservation Area but not owned by the developer applicant and not included in its latest Amended Planning Application.

I re-iterate that this plan is UNSOUND

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please be advised that as a resident of Cobham I strongly object to the Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - The Former Wisley Airfield - for a new settlement with 2000 dwellings.

I fully support the all of the objections set out by Cobham Conservation & Heritage Trust, Cobham Green Belt Group and Cobham & Downside Residents Association. These organisations are well aware that all of the services in the Cobham area, especially health and education, are already overstretched by the demands created by the influx of new residents from the Greater London Area.

For the record, my personal objections are as follows:

- The removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- The disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- The threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- The potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupants at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- The issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- Insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.
• The above objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2448  Respondent: 15397473 / Morgan Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Dear Councillors

My mum and Dad have been talking a lot about the Local Plan and I wanted to say that I am also against a new town. My school is already overcrowded and no room for any more kids. The roads on the way to school are always traffic jammed.

It is wrong to build on Green Belt land it is meant for our future, not for developers to make quick money building as its cheaper than sites that have already been built on.

I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2449  Respondent: 15397473 / Morgan Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Dear Councillors

I write to strongly object to the inclusion of The Former Wisley Airfield within the Draft Local Plan. Councillors recently agreed with local residents and refused their planning application WHY OH WHY IS IT STILL IN THE LOCAL PLAN!!!!!!!

I am one of the younger generation and I do believe in the Green Belt, I want GBC to preserve it for my generation and beyond.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2477  Respondent: 15399425 / William Emerton  Agent:
I have read the documents dated 13th June 2016, and 4th July 2016, submitted to Planning Policy, Guildford Borough Council by East Horsley Parish Council (EHPC) setting out its objections to Proposed Submission Plan and Policy A35.

I support the views expressed by EHPC and object to both proposals on the same grounds. They do not need repetition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Allocation A35 for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to: The assertion that the development will result in a meaningful shift to cycling and walking.

The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

The Village of Cobham attracts many visitors with its shops and restaurants and the most direct route from the area of Ockham is via Ockham Lane. This road was built for easy access to Cobham for use by the local residents, it is very narrow with no footpaths or cycling track and is only suitable for light traffic due to having very many bends and blind corners. It passes through Ratchford and a flood plain, it is very often closed due to flooding. The danger that any...
increase in traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) has to be considered.

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that 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 FWAIT FM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I raise objection to the Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings as we use this Green Belt are extensively for recreation and appreciation of wildlife.

There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land and as such No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt so I OBJECT to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

I OBJECT to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys, Effingham and Cobham. The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs, this in no way is acceptable.

The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions. Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable/unachievable/unreal. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used, this car park is also at full capacity as are the route through Cobham Village to get to the station. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

I Object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

I Object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

I reiterate the area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford and the roads, public transport in the area are not of a standard to accommodate the development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2499  **Respondent:** 15400609 / Brian Carte  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**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 inclusion of the Former Wisley Airfield in your Borough plan.

Although I do not live in the borough I have lived in the area for over 40 years and have a great interest in the wider environment and how developments will impact on surrounding areas.

I see the proposal has no basis for inclusion when other brownfield sites can be identified, green belt should be preserved as a basis of preventing urban creep.

The surrounding areas, villages, roads, schools, countryside, will be swamped by such a development.

Residents in the area already suffer severe congestion on the local and national roads (A3 and M25). Air quality is already a major concern on many local roads being used by locals and those vehicles trying to avoid the aforementioned congestion.

The inclusion of this site is a little strange and surprising bearing in mind your own planning committees rejection of application no 15/P/00012 in April of this year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2514  **Respondent:** 15400769 / H L Cunnah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- **Local Road Networks -**

As mentioned above, the roads in the Horsleys struggle to cope with the volume of traffic that already exists. In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that "consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed". It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is inevitably true for the proposed developments in East and West Horsley as well.
- **Pollution**

  The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment - already a cause for concern in several areas in 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:** PSLPS16/2515  **Respondent:** 15400865 / M J Cunnah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

- **Local Road Networks**

  As mentioned above, the roads in the Horsleys struggle to cope with the volume of traffic that already exists. In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that "consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed". It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is inevitably true for the proposed developments in East and West Horsley as well.

- **Pollution**

  The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment - already a cause for concern in several areas in 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:** PSLPS16/2526  **Respondent:** 15400961 / Joan Plumtree  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to site A35 Wisley Airfield- 2000 homes that are totally inappropriate and unsustainable development in the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

"Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings"

As someone who has lived in Surrey for many years I strongly object to the above plan. The proposed development is far too big and would have an enormous impact on the surrounding communities. In particular it would lead to greatly increased congestion unless extensive new roads were planned and they, in turn, would destroy the ambience of the vicinity. Many local services are already stretched and an increase in population of this scale would greatly aggravate matters.

I urge you to reject this application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to GBC Proposed Submission Local Plan

Although I live outside the Borough I keep my horse at stables in the Borough and visit regularly to go riding on the Bridleways across the Former Wisley Airfield and the surrounding areas in the Borough.

I OBJECT to the Proposed Submission Local Plan for many reasons and in particular for the following key reasons:

1. I object to the use of the Green Belt for over 70% of new The brownfield land in the urban areas should used for rebuilding.
2. I object to removing from the Green Belt the Former Wisley Airfield and neighbouring properties on its southern No exceptional circumstances have been established to justify removing the land from the Green Belt.
3. I object to the threat the Proposed Local Plan poses to the historic rural village of The urban 2,068 dwelling development is totally out of character with this village of 159 homes.
4. I object to the adverse impact on transport, local roads and road I specifically object to the increased volume of car traffic. The proposed development would result in around 4,000 additional cars on the roads. This will cause congestion on the narrow rural roads in Ockham and the surrounding areas. The danger from this traffic will be to cyclists and pedestrians, and particularly to horse riders. The increase in the already severe congestion on the A3 and M25
5. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area, the Sites of Special Scientific Interest and Special Nature Conservation
6. I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am disappointed that my previous objections to the draft local plan have not been reflected in the latest draft.

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. No effort has been made to demonstrate exceptional circumstances for the removal of any land from the Green Belt. I object that the green belt has been preferred over brownfield land in the urban area without taking notice of the response to previous consultations.
2. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
3. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
4. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
5. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
6. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
7. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
8. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
9. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
11. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
12. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”
13. Opportunity (3) should be common to all sites and is not unique to this site
14. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.
15. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
16. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
17. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.
18. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

19. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

20. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

21. I object to the fact that the council has failed to remove this site from the local plan despite receiving many thousands of objections from local residents and statutory consultees in two full consultations.

22. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

23. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.

24. I object to the Council wasting taxpayers and residents’ time and money not following due process and in particular ignoring previous representations.

25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

27. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.

28. I object to the Housing number which is unsound and open to legal challenge.

29. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.

30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2546  **Respondent:** 15405601 / Joe Lethbridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Objections to Guildford Borough Council Proposed Submission Local Plan**

I OBJECT to the draft Submission Local Plan and the inclusion of the Former Wisley Airfield in the Plan for the following reasons:

- I object to a plan with 70% of new housing in the Green There is ample brownfield land in the urban areas of the Borough. That would reflect election promises to preserve the Green Belt.
- I object to the housing number of 693 houses per year; this estimate is far too high and is the result of hidden It cannot be justified.
- I object to the proposal to remove the Former Wisley Airfield (FWA) from the Green There are no exceptional circumstances to warrant removing the land from the Green Belt.
• I object to this urban 2,000 plus house development being placed in the historic rural village of 159 homes in
• I object to the impact on transport, local roads and road The proposed development would result in around
4,000 additional cars on the roads. This will increase the danger from traffic to horse riders, cyclists and
pedestrians on the narrow rural roads in Ockham and the surrounding area. It will increase in the already very
bad congestion on the A3 and M25.
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of
the site, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific
Interest (SSSI) and Special Nature Conservation Interest (SNCI).
• I object to the threatened loss of high quality

The Former Wisley Airfield, site A35, should be removed from the Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4110  Respondent: 15405601 / Joe Lethbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons
including the following:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by
nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many
constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain
how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not
capable of being accepted.
5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over
50,000 objections from local residents and statutory consultees.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood
zone 2 and 3
7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification
8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will
increase the negative impact of the views from the AONB.
9. Opportunity (3) should be common to all sites and is not unique to this site
10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has
already slipped. This constrains the site significantly in terms of building heights etc.
11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is
unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
12. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded
SRN and will therefore be unreliable and subject to frequent delays.
13. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most
congested junction in the country (J10)
14. It is further from railway stations than any other identified strategic site
15. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.

16. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.

17. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

18. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).

19. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

20. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

21. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”.

22. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.

23. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

24. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

25. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

26. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.

28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

29. I object to the Housing number which is unsound and open to legal challenge.

30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2548  **Respondent:** Florice Cole-Fontayn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Objection to Guildford Borough Council Proposed Submission Local Plan**

I live outside the Borough and keep my two horses at stables in the Borough. I visit regularly to ride on the Bridleways across the Former Wisley Airfield and the surrounding areas.

I OBJECT to the Proposed Submission Local Plan for many reasons, particularly the following:
1. I object to the proposal to allocate so much new housing to the Green Belt; it should be put on the brownfield land in the urban areas of the Borough. That would reflect election promises to preserve the Green Belt.

2. I object to the housing number of 693 houses per year; this number appears to me to be far too high, particularly in the context of Brexit.

3. I object to the proposal to remove the Former Wisley Airfield from the Green Belt. There are no exceptional circumstances to warrant removing the land from the Green Belt. This area clearly fulfils an important objective of separating Ripley, Cobham, Woking and Horsley.

4. I object to this urban 2,000 house development would be totally out of place in the rural village of 159 homes in Ockham.

5. I object to the danger from its effects on transport, local roads and road safety. The proposed development would result in around 4,000 additional cars on the roads. This will increase the danger from traffic to horse riders on the narrow local roads in Ockham and the surrounding area and increase the already severe congestion on the A3 and M25. Cycling would be dangerous.

6. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area, and the Sites of Special Scientific Interest and Special Nature Conservation. Endangered ground nesting birds such as the Skylark and the Nightjar will be threatened by the development.

7. I object to the threatened loss of high quality farmland where crops have been grown for decades and probably for centuries.

8. I object to the continued inclusion of this site where a recent planning application has already been unanimously rejected by the Planning Committee.

I request that the Former Wisley Airfield, site A35, is removed from the Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
from this traffic will be to cyclists and pedestrians, and particularly to horse riders. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25

5. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest (SSSI) and Special Nature Conservation Interest (SNCI)

6. I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee. Please remove the Former Wisley Airfield from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4114  Respondent: 15405729 / Tiggy Hooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am disappointed that my previous objections (14th July 2016) to the draft local plan have not been reflected in the latest draft.

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. No effort has been made to demonstrate exceptional circumstances for the removal of any land from the Green Belt. I object that the green belt has been preferred over brownfield land in the urban area without taking notice of the response to previous consultations.
2. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
3. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
4. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
5. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
6. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
7. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
8. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
9. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
11. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
12. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”
13. Opportunity (3) should be common to all sites and is not unique to this site
14. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.
15. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
16. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
17. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification
18. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
19. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
20. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
21. I object to the fact that the council has failed to remove this site from the local plan despite receiving many thousands of objections from local residents and statutory consultees in two full consultations.
22. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
23. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
24. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.
25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
27. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
28. I object to the Housing number which is unsound and open to legal challenge.
29. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt. There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

I object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside. The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs. Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.

I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development. The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion. The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

I object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to object to the proposal to build on greenbelt land on the former Wisley Airfield.

Whilst I live outside the Guildford area I am very concerned at the impact it would have on the area:

Reasons for objections are:

I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt. There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

I object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside. The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs. Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.

I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.

I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

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 A35 (Wisley Airfield Development)

- Shouldn't be in the plan at all for the same reasons the Planning Committee rejected the identical proposal by Wisley Investment Properties

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 draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 3% of the population of GBC).
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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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, where 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.'s (WPIL) planning application was unanimously rejected by GBC on 6th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I have previously written objecting to the development of the former Wisley Airfield for over 2000 houses. Still seeing this included in the plan again after it had been shown comprehensively not to be appropriate is ridiculous and should immediately be discarded from the plan.

It is appreciated that some new housing is required in the area but it would appear that the planned number of houses required is grossly inflated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, 36% of the Plan's new housing is proposed in the northeast of the borough (x% of which is allocated to TFM), an area that at present has only 11% of existing housing.

5. I object to the loss of the historic rural village of Ockham. 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 stories high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to assume a reduced reliance on private cars.
   2. The increased volume of cars: A proposed development of 2,068 homes would indicate an increase of approximately 4,000 additional cars on the roads.
   3. The impact this traffic will have on the narrow rural roads in Ockham and the surrounding areas, also including increased bus and lorry movements.
   4. The impact this traffic will have on local cyclists and pedestrians, due to the absence of any cycling paths and the lack of proper pedestrian footpaths (and the space to provide them).
   5. The impact on the already congested Strategic Road Network on the A3 and M25. A further planning application at RHS Wisley (with increased visitor traffic) and a proposed 600 pupil secondary school would add further congestion at the M25/A3 junction as well as local roads. Infrastructure enhancements to the A3 and M25 would have to be completed before any development commences. Highways England has stated that they have no plans to even consider improving the A3 before 2020.
   6. The lack of suitable public transport: The local rail stations of Effingham and West Horsley cannot cope with the proposed increase in passenger traffic.

- I object to the fact that insufficient consideration has been given to the site's value from an environmental and ecological standpoint, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest (SSSI) and Special Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

- 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. 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% both wish to see the historic features of the village maintained and to protect the village's green spaces, including the FWA/TFM.

- Lastly, I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/2589  Respondent: 15407809 / Valerie Platt  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

8] Eighthly I object to the proposed development of the Wisley site and am astonished that GBC has even considered including the site in the Local Plan, especially since planning has already been refused. Whilst I agree that the Wisley developers have included much needed extra infrastructure, the whole plan completely fails on the traffic issue. Our local roads are already very congested and the roads around the M25 and A3 junctions are mostly chaotic. It would be absolute madness for GBC to consider this plan unless it was for a very small number of houses which did not create the risk of further traffic chaos. Under no circumstances can this site be considered without careful and close discussion with local Wisley and Ockham residents, in particular.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2596  Respondent: 15408065 / H P Finnamore  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Dear Sirs  

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings  

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally, I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
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  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will
exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2598  Respondent: 15408225 / Tabitha Scotland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

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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:** PSLPS16/2600  **Respondent:** 15408321 / Tallulah Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**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: PSLPS16/2620  Respondent: 15411425 / Andrew Stewart  Agent:*  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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**Comment ID:** PSLPS16/2628  **Respondent:** 15411681 / Peter Anscombe **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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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>15411777 / Gill Buckland</th>
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- lack of public transport, buses and trains and lack of commuter parking at existing stations.

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Attached documents:

Comment ID: PSLPS16/7503  Respondent: 15411777 / Gill Buckland  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/2632  Respondent: 15411809 / C Hewlett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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I support the objection made by WAG as well as the objections made by Ockham/Ripley/East Horsley parish councils.

I object particularly to the loss of the publane footpath which cross the Wisley Airfiled, I played some part in getting the footpath instated and sedicated.

I object any plan which is dissected to violate the Green Belt.

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**Attached documents:**

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**Comment ID:** PSLPS16/2649  **Respondent:** 15418881 / Caitlin Davey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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<td>Caroline McDermott</td>
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**Comment ID:** PSLPS16/2652  **Respondent:** 15418977 / Alexis Dunning  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to state my objection to the building of 2,000 new homes on the Former Wisley Airfield. The A3 is already under pressure from traffic with the interchange of the M25. I live in Cobham and use the A3 nearly daily, the increase of traffic over the last few years is disproportionate to the area. Access onto the A3 from Elm Lane off the airfield is very dangerous as is Old Lane, a potential increase of over 2,000 vehicles, even through Hatch End, Martyrs Green area, would impact greatly on Cobham, which is often at a standstill.

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>PSLPS16/2671</th>
<th>Respondent:</th>
<th>15419649 / Ann Dunning</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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I object to the draft Local Plan for the following key reasons:

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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: PSLPS16/2689  Respondent: 15420449 / Stefan Wasilewski  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In common with many residents I consider there to be sufficient brownfield sites and other avenues to accommodate reasonably affordable housing than to sacrifice greenbelt land and our children's future capacity to grow food.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

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Attached documents:

Comment ID: PSLPS16/2696  Respondent: 15420641 / A Patel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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Attached documents:

Comment ID: PSLPS16/2697  Respondent: 15420673 / Kevin Freelend  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
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2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
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development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2701  Respondent: 15420865 / Thomas Jimmison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
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6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

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• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
Objection to Guildford Borough Council Proposed Submission Local Plan

Although I live outside the Borough I am, and have been for many years, the tenant farmer at Bridge End Farm in the Borough. I visit every day the Former Wisley Airfield and the surrounding areas. I am disappointed that my previous objections to the draft local plan have not been reflected in the latest draft.

I OBJECT to the draft Submission Local Plan for many reasons, particularly the following:

• I object to the proposal to allocate so much new housing to the Green Belt; it should be put on the brownfield land in the urban areas of the
• I object to the housing number of 693 houses per year; this number appears to me to be far too high, particularly in the context of Brexit
• I object to the proposal to remove the Former Wisley Airfield (FWA) from the Green Belt. This area clearly fulfils an important objective of separating Ripley, Cobham, Woking and Horsley.
• I object that this urban 2,000-house development would be totally out of place in the rural environment of Ockham.
• I object to the danger from its effects on transport, local roads and road safety. The proposed remote development of 2,000 homes would result in around 4,000 additional cars on the roads, with residents having to drive to work and drive children to school. I am obliged to drive my large tractors on the narrow local roads in Ockham and the surrounding area as well as on the A3. More cars would increase congestion on the local roads and the A3. Cycling would be dangerous.
• I object to the threatened loss of high quality farmland, including 4ha classified as Best and Most Versatile land where crops have been grown for decades and probably for centuries.
• I object to the continued inclusion of this site where the Planning Committee has already unanimously rejected a recent planning application.

I request that the Former Wisley Airfield, site A35, is removed from the Submission Local Plan and the land kept as Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to Guildford Borough Council Proposed Submission Local Plan

Although I live in Surbiton I drive every week to visit friends in the Borough.

I OBJECT to the draft Submission Local Plan for the following reasons:

- I object to the proposal to take so much land out of the Green Belt; new housing should be put on the brownfield land in the urban areas of the
- I object to the proposed number of houses; it seems too
- I object to the proposal to remove the Former Wisley Airfield from the Green Belt; it separates Ripley from
- I object to the urban 2,000 house development being placed in the historic rural village of 159 homes in
- I object to more development which would have an impact on transport, local roads and road safety. The narrow rural roads in Ockham and the surrounding area cannot cope with the extra traffic, which would increase the already severe congestion on the A3.
- I object to the continued inclusion of this site A35 where a recent planning application has already been unanimously rejected by the Planning

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2734  Respondent: 15421761 / Andrew Hayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to Guildford Borough Council Proposed Submission Local Plan

Although I live in New Malden I drive regularly to visit friends and take my daughter to where she keeps her horse in the Borough.

I OBJECT to the Proposed Submission Local Plan and the inclusion in the Plan as a potential site for development of the Former Wisley Airfield for the following reasons:

1. I object to the proposal to take so much land out of the Green Belt which should be preserved for future generations; new housing should be put on the brownfield land in the urban areas of the
2. I object to the housing number of 693 every year; it is too high. I object that the public has not been told any details of how this figure was determined. It should be reviewed independently, additionally to reflect to impact of Brexit which is likely to reduce the number of foreign students wanting to come to this country.
3. I object to the proposal to remove the Former Wisley Airfield from the Green Belt; it separates Ripley from
4. I object to the urban 2,000 house development being placed in the historic rural village of 159 homes in
5. I object to more development which would have an impact on transport, local roads and road safety. The narrow rural roads in Ockham and the surrounding area cannot cope with the extra traffic, which would increase the already severe congestion on the
6. I object to the proposal that encourages many more cars causing further deterioration in air quality when the A3 and M25 are already in breach of regulations; the acid deposition on the nearby SPA is also in breach of
7. I object to the continued inclusion of this site A35 where a recent planning application has already been unanimously rejected by the Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to the draft local plan

I object to the development at Wisley on the grounds that the development is huge (higher than an urban one) resulting in vast numbers of additional cars which the roads are completely unable to cope with.

I support the objection made by the parish councils of Ripley, the Horsleys, Ockham on the grounds that the government (and local councillors) pledged to protect the green belt.

I object to the Local Plan as it would encourage Urban sprawl linking the villages eventually with Woking.

I object to the development on Long Reach. It is not a "suitable alternative" although it definitely is a "Natural Greenspace" and as such any development would wreck the countryside which separates the villages of Ripley, the Horsleys and Ockham.

I sometimes wonder if the planners who come up with this local plan actually travel on local roads or do they simply look at a map and see a road.

The roads in this area (Ripley/ Send/ Horsleys/ Ockham/ Pyrford) are COMPLETELY UNSUITE to a huge increse in traffic and the whole area (THE COUNTRYSIDE) does not deserve the added polution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2776   Respondent: 15423169 / W.F. Sennett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although I do not live in the Guildford Borough, I live much closer to the above undesirable proposed development than many others who do.

I particularly object to the Wisley site being removed from the Green Belt. This would run counter to the whole purpose of the Green Belt in preventing urban development which could ultimately see Guildford subsumed into the mass of London - there are no special circumstances that would justify this. I object also to the proposed increase in housing in
Ockham, Ripley, the Horsleys and Effingham for the same reason and also because this would change the whole character of the area very much for the worse.

There would be many other harmful side effects but particularly the impact on local roads, especially the A3, and services of the increase in population. Congestion is already quite severe and the regular presence of a further 4,000 (at least) cars plus service vehicles could lead to gridlock in a number of places and there would be a serious deterioration in air quality.

Little consideration seems to have been given to the environmental and ecological value of the site and the surrounding area.

There is plenty of brownfield land that could be developed without the need to threaten the Green Belt and I hope that the council will reconsider.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2450  **Respondent:** 15425665 / East Clandon Parish Council (Alyson Blackwell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

We object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2805  **Respondent:** 15426017 / Heather Harrison-Tams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
2. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
3. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
4. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• 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. 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.
• I object to the continued inclusion of a site (the former Wisley Airfield,- now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
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• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley’s (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• 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 storey’s high and a population density higher than most London boroughs.
• I object to the detrimental impact on transport, local roads and road networks I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2810  Respondent: 15426241 / Piers Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous pl
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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.

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- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: PSLPS16/2814</th>
<th>Respondent: 15426337 / C Cope</th>
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<td>Wisley Airfield (A35) and Garlick’s Arch (A43) are in locations that do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. The sites are totally unsustainable. There are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport.</td>
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Attached documents:

Comment ID: PSLPS16/2826  Respondent: 15426817 / Lynn Currall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
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   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
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6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2835  Respondent: 15426945 / Sue Kilpatrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Cobham & Downside Residents’ Association object to the above draft Local Plan on the following grounds:

- The removal of the former Wisley Airfield from the Green Belt – the Green Belt prevents the urban sprawl and no exceptional circumstances have been established to warrant such a removal.

- There is ample brownfield land in urban areas which need to be regenerated.

- There would be a disproportionate allocation of a proposed increase in housing to the settlements of Ockham, Hatchford and Downside.

- Harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs to service the development.
• The assertion that the development would result in a considerable increase in cycling and walking is astonishing. There is insufficient space to provide cycle lanes/footpaths and those attempting to cycle or walk could be put at risk

• There would be an increase in the already severe congestion on the A3 and M25 and the junctions of those major roads as well as local roads

• The lack of suitable public transport

• Air quality has not been given serious consideration. Air pollution in this area already exceeds DEU-permitted levels, affecting adversely the health of current and future residents

• Objections are supported by the unanimous rejection of Application No 15/P/00012 by the Planning Department of Guildford Borough Council on 8 April 2016

The reasons for not removing the former Wisley Airport from the Green Belt are overwhelming and it is very much hoped that the Consultation will result in the Green Belt status being retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2853  Respondent: 15427649 / Alan Martin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although I am not a resident of Guildford Borough Council, as a resident of Cobham (Elmbridge) I would be adversely affected if the above Plan were to be approved, bearing in mind the proximity of the former Wisley airfield to Cobham. I request you to reject the Plan, in particular for the following reasons:

1. The area of the former Wisley airfield serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
2. No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
3. There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
4. There would be a disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
5. My home town of Cobham is the closest shopping area to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic.
6. There is a lack of public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
7. Protected species on and near the site and wildlife corridors would be destroyed.
8. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the Plan. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

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2. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

3. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK,

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2879  Respondent: 15428097 / Bridget McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
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2. THREE FARMS MEADOWS SITE (Wisley Airfield) Policy A35
I STRONGLY OBJECT to the location of a new town with some 2000 new houses in the middle of the greenbelt in the
middle of nowhere. This planning application was unanimously rejected by the GBC planning committee recently on 14
separate grounds. The site is located miles away from any public transport, is on a site that floods regularly and is
surrounded by narrow, muddy, winding, unlit country lanes. The addition of at least 4000 cars will cause a constant
gridlock throughout the area. An assumption that residents will walk or cycle to reach amenities is completely unrealistic.
An infirm pensioner cannot be asked to walk along these narrow lanes to the doctor and to expect them to cycle would be
unacceptable. There is no employment nearby which would result in a huge growth of commuter traffic on the A3 and
nearby country lanes causing more pollution and traffic jams; commuter trains are already standing room only and this
new town would increase the number of commuters and cause chaos on a daily basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2876  Respondent: 15428161 / M Ozcan  Agent:
Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/2886  Respondent: 15428865 / Marjorie Sennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although I do not live in the Guildford Borough, I live much closer to the above undesirable proposed development than many others who do.

I particularly object to the Wisley site being removed from the Green Belt. This would run counter to the whole purpose of the Green Belt in preventing urban development which could ultimately see Guildford subsumed into the mass of London - there are no special circumstances that would justify this. I object also to the proposed increase in housing in Ockham, Ripley, the Horsleys and Effingham for the same reason and also because this would change the whole character of the area very much for the worse.

There would be many other harmful side effects but particularly the impact on local roads, especially the A3, and services of the increase in population. Congestion is already quite severe and the regular presence of a further 4,000 (at least) cars plus service vehicles could lead to gridlock in a number of places and there would be a serious deterioration in air quality.

Little consideration seems to have been given to the environmental and ecological value of the site and the surrounding area.

There is plenty of brownfield land that could be developed without the need to threaten the Green Belt and I hope that the council will reconsider

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2963  Respondent: 15430369 / Sarah Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2956  Respondent: 15430433 / Simon Greenhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/2966  Respondent: 15430497 / Martin Chalk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2927  Respondent: 15430849 / Christopher Campbell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

*I draw your attention to the speech made by the new Prime Minister of the UK Theresa May in her inaugural speech where she said when questioned on fulfilling the need for more house building:
I AM NOT TALKING ABOUT BUILDING IN THE GREEN BELT.

THE GREEN BELT IS VERY IMPORTANT

Theresa May spoke further about the need to plan “MORE CLEVERLY”.

Building on the Green belt is not “Clever”, therefore:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3003  Respondent: 15430849 / Christopher Campbell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.
6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
3. 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 Council. 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.
4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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 because Wisley airfield is greenbelt land, there are plenty of brown belt sites that could be developed, it would be completely wrong to develop this area of outstanding natural beauty, it will be greatly detrimental to the wildlife there, the narrow rural lanes are not suitable for the large increase of traffic and the congestion it will cause and there will be an increase in air pollution, it will be shameful if Guildford borough council allow this development to go through for the reasons above and for the people living in the area, I don't live by the area but I go to the area often and know people in the area and it's shocking to think this lovely area could be destroyed by development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2983  Respondent: 15432705 / Gordon Bennett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Draft Local Plan for the following reasons.

(1) I object to the plan as the site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which already running over capacity.

(2) I object as the application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit, and there is no spare parking capacity at either of the local stations.

(3) I object because a site of this size are required to provide outdoor open space. The applicant has not complied with this requirement but rather has “double counted” the outdoor space with that required for SANGS.

(4) I object to the loss of high quality agricultural land is in contravention of policy.

(5) I object on the grounds of Air quality. The air quality figures are based on an unreliable transport assessment and therefore should not be used in evidence.

(6) I object as there is documentary evidence that the applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source).

(7) I object as a person who has COPD to the poor air quality which will be exacerbated in the area by such a development. Young and Old are extremely susceptible to poor air quality.

- It is clear that air quality is deteriorating largely due to the emissions from the traffic, I believe that the impact of poor air quality on the internationally famous RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area is already in excess of legal limits.

(8) I object because in my opinion the transport assessment makes a number of ridiculous assumptions and is not credible. It is completely unrealistic to assume that there will be a decrease in vehicle movements after completion of this development, and there will no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children living on site will have to be transported to the nearest available school in Leatherhead.
– adding to congestion and pollution, and there will be no impact shown for the 270 daily bus movements which will impact local roads further, or for the waste lorries or HGV deliveries to the site.

The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.

(9) I object because the number of daily trips is understated in the region of 1000 vehicle movements. Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham, Ripley, and Downside and further afield. If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those planned by the RHS.

(10) I object because the site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the Special Protection Area and the M25 to the north and the Conservation area of Ockham Village to the south. Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances. The applicant has not demonstrated that exceptional circumstances exist.

(11) I object because the four and five storey buildings are not appropriate in the rural environment. Residents will be crammed in with little outdoor space, in a noisy location with very poor air quality.

(12) I object to the proposed closure of local road, coupled with the massive increases in traffic, will effect us & a large number of other road users from Cranleigh to Cobham and everywhere else in between. We regularly have to use Ockham Lane to avoid the chaos on the A3 when picking up our Grandchildren from school in Cobham.

Further, Ripley- The traffic data suggests fewer vehicles (15-28% less than today) on Portsmouth Road/High Street and Newark Lane. This information is flawed. We are daily subjected to queuing traffic on the Portsmouth Road, and as senior citizens have given up in crossing this road to take our walk through to Polesden sailing club.

More traffic queuing in Ripley High Street will increase levels of NOx and NO2 pollution, possibly beyond EU limits.

- Additional traffic accessing the A3 will lead to longer journey times and additional driver stress. - The closure of Ockham Lane to vehicles will result in your separation from schools, doctors surgery etc. resulting in longer journey times and delay (via Old Lane/Forest Road or Old Lane/through the development, Ockham Road North to Horsley) More noise and dust pollution through the 12 year build resulting in loss of amenity- Loss of country footpaths and bridleways which become rights of way through a densely populated settlement.

-- Traffic assessment does not include the A245 or Painshill junction despite the fact that it is likely that these roads will carry significant additional traffic.

We already have had to choose to curtail early appointments at the Village Surgery Send, because of the traffic build up at the Burntcommon Roundabout.

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:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2998</th>
<th>Respondent: 15433473 / Kay Webb</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads, including Send.

I OBJECT to the fact that the Local Plan takes no account of Schools, Doctors surgeries and roads that are already operating at full capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3019</th>
<th>Respondent: 15433505 / Hugh Grear</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Objections to the continued inclusion in the Guildford Borough Council Proposed Local Plan (June 2016) of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of FWA/TFM in the draft Local Plan for the following key reasons: 1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. FWA/TFM is prime green belt, and was given to the country for an airfield as part of the war effort, based on the promise that the land would be returned to the community after the need for an airfield had passed. This promise has been broken, and no effort has been made to see whether there is a moral or equitable duty to return this land to the existing community.

- I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham (of which I am the Rector) and the blight on properties th 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
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  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
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  6. The lack of suitable public The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. In particular, two schools should not be planned in the FWA/TFM area which is known to have poor air quality, which will only be exacerbated by the planned development.
• 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 Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee . After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 3th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this I Those reasons remain valid, and there are no adequate ways to overcome them.

• Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• There can be no certainty about whether the site can ever be developed and even on the best scenario commencement of development is certain to be many years hence. The location and sustainability of the site are both questionable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3005  **Respondent:** 15433665 / Andrew Holley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Ockham.** As someone who worked for 20 years in museums and the historic environment, I am particularly concerned about the threat posed by the Local Plan to the rural village of Ockham, which has many fine listed historic buildings including the Grade I listed All Saints Church. The Plan calls for a small village of 159 residences with a low level of public amenities to be subsumed into a development including over 2,000 dwellings. In addition, many of the proposed buildings are high density dwellings up to five stories high, making them completely inappropriate for a rural area such as Ockham and its environs.

I hope that these objections will be fully considered by the Council and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, will be removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3006  **Respondent:** 15433665 / Andrew Holley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Former Wisley Airfield/Three Farms Meadow.** I believe that the FWA/TFM should not be removed from the Green Belt. The site should be protected in order to prevent further urban sprawl from London. It is also a valuable leisure resource for local people and visitors. The local wildlife also needs to be protected from development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3008  **Respondent:** 15433697 / Beniah Grear  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
Objections to the continued inclusion in the Guildford Borough Council Proposed Local Plan (June 2016) of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation 35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of FWA/TFM in the draft Local Plan for the following key reasons: 1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.

The site serves a vital role in protecting against urban sprawl from London.

Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. FWA/TFM is prime green belt, and was given to the country for an airfield as part of the war effort, based on the promise that the land would be returned to the community after the need for an airfield had passed. This promise has been broken, and no effort has been made to see whether there is a moral or equitable duty to return this land to the existing community.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley's (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic resulted in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
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6. The lack of suitable public transport. The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

6. S) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. In particular, two schools should not be planned in the FWA/TFM area which is known to have poor air quality, which will only be exacerbated by the planned development.
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- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Those reasons remain valid, and there are no adequate ways to overcome them.

- Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5165  Respondent: 15433697 / Beniah Grear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

16. I object to the removal of additional 3.1 ha from the green belt without any justification.

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. Indeed, in ordinary words and common language, I believe that this draft local plan, and these revisions, in totality, but in particular relating to Three Farm Meadows are “bonkers”!

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? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will
exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. 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.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The impact of over 2000 houses in the Wisley/Ockham area would have a huge impact on the Horsleys. Just 2 miles away and with a local railway station with easy access to London raises unimaginable, additional, traffic problems in an already very congested village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Connection to the trunk roads of the A3 and M25 can only be via the roundabout at the North end of Ripley which is already a seriously difficult access going north. Going South would have to pass through the village of Ripley which is already congested at busy times.
• Air quality is already poor here because of the proximity to the A3/M25 junction. Major development here and especially the increase in traffic would make it worse.
• There is much wildlife on the site and surrounding area, some of it endangered, it would be seriously impacted by a major development at this site

Guildford Borough Council recently rejected planning application 15/P/00012 for two thousand houses on this site for the above reasons and the resultant report spells them out.

Please amend the plan to keep Wisley Airfield as part of the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Fields are available to help people to have access to healthy open spaces - this is helpful in terms of children’s development and mental health improvement for people of all ages.

The proposed plan is too large and should concentrate on Brown Field sites such as the Wisley Airfield at Ockham which is a concrete/tarmac jungle with noise from the A3. This could be made into a proper village with facilities for families, single people, the elderly and social housing and also a traveller site. Unlike the plan for the rest of the villages where landowners will not take into account with developers on enhancing people’s lives.

Some development is necessary but not in this scale and taking over the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object very strongly to the revised draft local plan to develop in the Ockham/Horsleys area. The impact of siting a new residential development of over 2000 households at Ockham so close to the villages of East and West Horsley would be tremendous, the extra traffic alone on the local roads is inconceivable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object most strongly to the above proposal. Although we are not living in the borough of Guildford, Cobham be
affected by such a development as we believe the traffic on the A3 would be absolutely horrific if the proposal should go
ahead. The slip road off of the A3 to Cobham is already a nightmare every morning, and we dread to think of the impact
such a large development would make.

Parking is also a major problem in Cobham at the moment, and this would become intolerable with so many more houses
in the area.

We trust that the Council will reject this most inappropriate scheme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4337  Respondent: 15438049 / David A Sprigings  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to site allocations A35 Wisley Airfield, A43 Garlick's Arch and A58 Land around Burnt Common as the
scheduled delivery of the important local transport infrastructure developments is unjustifiably late in the process, eg:
- A43 Garlick's Arch is stated to be available in the first five years of the plan with 400 homes (0) and 6 Travelling
  Showpeople plots proposed: "There is no available alternative site that can provide Travelling Showpeople plots in the
  first five years of the plan to meet need", 2017 Sustainability Appraisal.
- A58 Land around Burnt Common warehouse, London Road, Send: Land Availability Assessment (2017 Addendum)
  page 15: "There is a realistic prospect that development will be delivered within the first five years of the Local
  Plan"; page 16 "Timescale 0-5 years".
- SRN 9 and SRN 10, new A3/A247 junctions are stated to be scheduled during the period 2021 to 2027. (Guildford

LRN7 Interventions to address potential highway performance issues resulting from the development at former Wisley
Airfield site, including various mitigation schemes to address issues affecting Ripley High Street, A3 Ockham
Interchange and M25/A3 Junction 10, are stated to be scheduled for likely delivery during the period 2021 to 2033.
(Guildford Borough Transport Strategy 2017 page 23). It seems ridiculous that the Local Plan is based on developments
A43 and A58 taking place or at least begun BEFORE the required improvements to major local transport networks.
Unless the major road network improvements take place before the site developments, the Ripley/Send Marsh/
Burntcommon/Send/Clandon area will be subject to severe traffic congestion arising from the site developments
with very limited access for the vast number of heavy vehicle journeys that will be required which will cause an absolute
nightmare for traffic in these villages. It will make Portsmouth Road even more dangerous than it is already at its
various junctions.

The addition of new A3/A247 junctions (A43a; SRN9, SRN10) will not help the area of these villages as it will
encourage far more traffic to join/leave from the A3 via the A247 meaning much more traffic through Clandon, with its
very narrow bends on the A247, and Send in particular, the latter making it more dangerous for pupils, parents and staff
at Send Primary School and also more dangerous for both patients and staff at The Villages Medical Centre, as well as
local residents and businesses in Send.

Although the draft Local Plan includes reference to the Highways England (HE) Proposed M25/A3 Junction 10
improvement it takes no account of the HE attention to close off access from the A3 northbound onto Wisley Lane, which
includes access to RHS Wisley. The HE plan is to only have access to Wisley Lane from a slip road running parallel to
A3 northbound, its only access being from the Ockham Interchange (Ockham/Ripley roundabout) which will only be
accessible from the southbound A3, with NO ACCESS FROM THE NORTHBOUND A3. Although HE say that there
will be signs on the northbound A3 advising drivers to go to the M25 junction roundabout, turn around and leave the A3 southbound at Ockham Interchange for Wisley/RHS Wisley, human nature being what it is most such drivers will leave the A3 northbound at London Road B2215 and drive through Burnt Common, Send Marsh and Ripley to get to Ockham Interchange for access to RHS Wisley. So every time an event takes place at RHS Wisley we can expect even worse traffic congestion through Burnt Common, Send Marsh and Ripley which makes the building of 400 homes at Garlick's Arch on Portsmouth Road even less appropriate, and Travelling Showpeople with heavy vehicles for fairground equipment an even bigger mistake. A43 Garlick's Arch should be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3123  Respondent: 15438753 / Peter Fairbrass  Agent:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

It is of great importance to all those who properly care about our much envied way of life and the quiet enjoyment we have of that life, is that those elected to protect the wishes & aspirations of said electorate, comply totally with all that they were elected to do – we have just witnessed what happens when even our elected government fails to realise what the majority of the electorate expect!

The fact: The people who put you there can take you away!

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3241  Respondent: 15442721 / Elizabeth Robson  Agent:

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Document page number
2157
I object to the development of site A35 near Wisley because:

- Of all the reasons raised during the recent planning application process and are too numerous to list but include building on the greenbelt, size, lack of facilities and traffic issues.
- The Council should not be revisiting issues already dealt with in detail by the planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3244  Respondent: 15442977 / Laura Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

I object to the above planning for the following reasons:

- Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- It's a disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- Object to the threat of the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could...
not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.

- Object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

- Object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3250  **Respondent:** 15443105 / Jane Holman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Wisley air field being developed with over 2000 new homes. It is too many in a very small village of outstanding natural beauty and green belt.

I object to housing as the roads surrounding Ockham are narrow and already have too much traffic cutting through grin the A3 & M25 junction 10.

I object also as there are no secondary schools that could cater for more children than it already does and certainly not hundreds as it could be. It is extremely difficult to get into- The Howard of Effingham, the nearest to Ockham.

I am a regular visitor to the village where I have parents living there, I hope this is stopped.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: PSLPS16/3270</th>
<th>Respondent: 15445665 / Jonathan Hewlett</th>
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3) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

10) 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 space. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

11) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3272</th>
<th>Respondent: 15445697 / Jane Mary Hall</th>
<th>Agent:</th>
</tr>
</thead>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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>
5. Shortly before this Local Plan was published Guildford Borough Council totally rejected the application to redevelop Wisley Airfield, yet here it is again. The current proposal would destroy the village of Ockham. In effect the proposal is for a New Town with houses and blocks of flats packed close together on a density scale more appropriate to an inner London borough and the site is largely Green Belt. This development would increase the number of vehicles needing to park at Horsley Station and Effingham Junction which are already full to capacity most days.

I OBJECT to the intense use of this largely Green Belt land for housing units, the insetting of the

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3280  **Respondent:** 15445985 / Richard Humphreys  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **is Legally Compliant?** ( )

I am writing to state my objection to the removal of the former Wisley airfield site from the green belt.

Although I live in Cobham I commute to Ockham on a daily basis for work.

The local roads and lanes could not cope with the proposed increase in traffic, let alone the A3 and M25 which is already gridlocked on a daily basis.

2000 homes in such a rural area would also have a devastating impact on local residents.

The nearest shopping to the proposed development is in Cobham which has local parking issues and a further possible 4000 vehicles added to this would on result in chaos.

There are also areas of SSI surrounding the site which would be hugely impacted by the increase of family pets from such a number of houses. [cats and dogs etc]

There must be a number of Brownfield sites in and around Guildford that should be considered for development before destroying our precious Greenbelt that once gone can never be replaced.

It would also increase the tendency for urban sprawl. How long before Surrey becomes part of London?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3290  **Respondent:** 15446401 / Louise Yandle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **is Legally Compliant?** ( )
I object to the removal of the former Wisley Airfield from the Green Belt. The site is important in protecting against urban sprawl from London and if built on, will mean an urban corridor from London to Guildford. There are no circumstances whatsoever that warrant removing this land from the Metropolitan Green Belt.

I object to the continued inclusion of the side known as Three Farm Meadows when the planning application has been unanimously rejected by Guildford Borough Council's planning committee. Serious concerns about the site have also been raised by authoritative sources across the UK including Highways England, Thames Water, NATS and the Environment Agency.

I trust these objections will be fully considered and the former Wisley Airfield (Three Farms Meadows) Allocation A35 is removed from Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6277  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6752  Respondent: 15446401 / Louise Yandle  Agent:
**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID**: PSLPS16/3316  **Respondent**: 15447681 / Malcolm Hughes  **Agent**:  
**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I live in Cobham. The level of traffic on the main Cobham roads has increased dramatically over the past few years. If we are to add 2000 more houses then the impact to Cobham will be horrendous.

Therefore I object to this planning proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID**: PSLPS16/3327  **Respondent**: 15448001 / Ann Dowdeswell  **Agent**:  
**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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?
I object to the Development of over 2000 house village at Ockham (former Wisley Airfield). The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away would be enormous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5489  Respondent: 15448289 / Paul Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3380  Respondent: 15449057 / John Gribble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to object to the Guildford Borough Plan on the following points:

- I am against the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- I am against the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000+ dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic if the proposal is implemented will cause serious congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development and will not be able cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- There is no suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used but the car park there is already full. The use of Cobham or stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- I object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.
- Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

The existing local services such as foul and surface water drainage cannot cope with such a major addition without resulting in increased flood risk.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), Hatch Lane Ockham, GU23 6NU now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwelling

I write to strongly object to the inclusion of TFM in the current draft Local Plan for the following reasons:

1. I object because the impact on the local greenbelt area will be unacceptable and it seems that the applicants have shown a total disregard for those residents that have been living here for many years. It beggars belief that the TFM developer’s plans include the closure of several of our local roads forcing us to take detours of several miles to get to our destinations.

2. I object because it is a fact that there is currently severe congestion on the major roads in the area yet this plan would bring an addition of well over 4,000 extra cars for the houses alone plus all the extra cars bringing the school students to the proposed school.

3. I object because the suggestion that people in the area should stop using their cars in favour of walking or cycling is ludicrous. There are no footpaths on these unlit country lanes, no cycle tracks and with the speed at which traffic leaves the adjacent A3 and races down Old Lane no-one in their right mind would risk their life on either mode of travel. Road public transport doesn’t exist in the area.

4. I object because the roads are not coping with the current through traffic and neither are the road surfaces with many potholes and dangerously deep gullies alongside the carriageways and they regularly flooded. I wrote to the council about two roads (Plough Lane and Horsley Road) that are frequently flooded but was told there is no funding in the budget to resolve the situation. Incidentally the flooding was not as a result of the river breaking its banks as the council claimed but by the excess water coming off the surrounding fields which should be controlled by ditches.

5. I object because of the increased number of commuters this will bring to an area where rail public transport is already completely overstretched. How would the two local stations cope with the increased commuter traffic let alone the road council lanes? The distance from the TFM development would necessitate the use of a car. The Railway stations of Effingham and East Horsley are well over a mile from this site and neither of them have spare parking capacity.

6. I object because of the effect resulting from the increased sewerage output that will be caused. How will the water supply cope with the demand? Thames Water have concerns with the limited capacity.

7. I object because of the claim that housing shortage is a reason for the TFM development but there are plenty of alternative sites to resolve this situation. This site was not listed for development under the 2003 Local Plan probably because there is not enough land to provide a sustainable community based on GBC’s own parameters. There are still no “very special or exceptional circumstances” to have added this site to the Local Plan.

8. I object because the TFM developers have decided to include a secondary school in their plans having woken up to the fact that the existing schools would not be able to cope with the additional school age inhabitants. The nearest school, the Howard of Effingham is already extremely over-subscribed. I therefore object because if it is eventually built this new school would attract pupils from the surrounding area thus increasing the traffic congestion in the area even further.

9. I object because of the fact that when the airfield was requisitioned in wartime when an undertaking was made to return it to agricultural use, removing the buildings (which was done) and removing the runway which should have been done because this is a green belt area. TFM developer’s description of the site as brownfield is a gross over-simplification. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remaining runway, perversely a habitat for rare flora and fauna, (14ha) has never had any buildings on it. The remainder of the site (55%) is high quality agricultural land.

10. I object because the detrimental impact on the wildlife in this area of the green belt seems to have been totally dismissed as irrelevant. Creating a triangle with two seriously main roads and this band of densely packed houses leaves little room for the wildlife with perils on all sides.

11. I object to the fact that for those of us living in Ockham and the surrounding area would suffer the extreme detriment to the air quality and the visual and aural amenities of the area plus have to put up with the resulting destruction to the environment. The homeowners around Ockham and Horsley will have their life completely blighted by this new town as will the wild life.
12. Finally I strongly support the principle that the countryside should be protected from landowners whose only wish is to line their pockets which seems to me the main reason behind including this development in the draft Local Plan.

I thank you for taking the time to read my objections and for taking them into consideration when finalising the new Local Plan. I truly hope you will agree that the former Wisley Airfield site aka Three Farms Meadows (TFM) should very definitely be removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3404  Respondent: 15449601 / Brian Cochrane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I live outside the borough but I have a greater interest in what goes into the Guildford Local Plan for the local area than those living on the far side of the borough for the following reasons:

- The removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- The disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- The threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- The potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application...
there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

- The issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- Little consideration is being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3430  **Respondent:** 15449953 / Clare Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3431  **Respondent:** 15449953 / Clare Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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 object to the detrimental impact on transport, local roads and road safety. This is of particular concern as I have young children and walking to school is already a difficult task as cars are so fast along the road into the village. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. As mentioned above the traffic is a particular concern to me.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3433    Respondent: 15450049 / Michael Bedford    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although I live in Stoke D’Abermon which is in Elmbridge, I have known the area of Ockham and Wisley all my life and view with great apprehension the plans for putting some 2,000 homes on Wisley Airfield. There are ample brownfield sites in urban areas which are more suitable for development and which would be more sensible as these would be near to railway stations and bus routes. Wisley and Ockham are small villages and those who need to travel to London would have to use East Horsley, Effingham Junction or Cobham stations which would lead to considerable parking problems. These railway car parks are already overcrowded with parking in neighbouring roads which leads to traffic congestion. The development at Wisley would make matters much worse.

The nearest shopping centre with supermarkets, banks, restaurants etc. is Cobham. This is already a very busy town with severe parking problems and heavy traffic passing through all the time linking places like Walton and Weybridge on one side to Epsom, Leatherhead and Dorking on the other. More congestion and pollution problems.

If you have a new community with 2,000 homes, there are bound to be households with 4,000 cars. The husband needs one to get to his place of work or to drive to the most convenient railway station; the wife needs one for shopping and taking the children to school (if they can find places that is), with the result that 4,000 cars a day will want to join the A3 near to the junction with the M25. Imagine the accidents that will occur as drivers get impatient with all the overcrowding. On the other side, there are only traditional country lanes which could not possibly cope with an excess of traffic.

Air pollution will get worse especially in the morning and evening with people leaving for work and returning at the end of the day. Pollution there already exceeds permitted levels and the development of Wisley Airfield will make matters worse. I do hope that this scheme is finally rejected and that the airfield is returned for agricultural purposes which was its original function, and as we may have to produce more home grown food in the years ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3435    Respondent: 15450081 / James Walker    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. A35

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
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I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3516  Respondent: 15452289 / Claire Miller  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2953  Respondent: 15452289 / Claire Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35 in the draft Local Plan for the following:

1. It is the least sustainable strategic site identified because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to Junction 10 (M25) one of the most congested junctions in the country.
4. Local roads are at capacity, particularly when the SRN is not free-flowing due to accidents, diversions, roadworks etc.
5. Any public transport provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
6. There is insufficient employment available onsite and almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk or cycle on narrow unlit local roads on a regular basis.
7. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees.
8. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints (notably the provision of sewerage capacity).
9. I object to the Council wasting tax payers and residents’ time and money and not following due process, and indeed ignoring previous representations.

For the reasons above and numerous other reasons, this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Attached documents:

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Comment ID: PSLPS16/3683  Respondent: 15454465 / Marissa Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3682  Respondent: 15454497 / Rick Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/3681  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:
Comment ID: PSLPS16/3674  Respondent: 15454689 / Dave Herbert  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/3673  Respondent: 15454785 / Fiona Hodges  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/3672  Respondent: 15454849 / Charlotte Murphy  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/3671  Respondent: 15454881 / Mark Fielder  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/3670  Respondent: 15454913 / A Burston  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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Attached documents:

Comment ID: PSLPS16/3669  Respondent: 15454945 / Claire Cassar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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Comment ID: PSLPS16/3668  Respondent: 15455009 / Emma Graham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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<th>Respondent: 15455073 / Amanda Fletcher</th>
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<th>Respondent: 15455105 / Kate Robinson</th>
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Dear Sir, I am writing to object to the building of 2000 houses on the Wisley Airfield. My objections are the following: 1. Urban style houses with some 5 storeys high. 2. Another estimated 4000 cars. 3. Increase in pollution. 4. Severe congestion on already congested local and on the A3 and M25. 5. Environmental damage to an area full of already endangered wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the development of the former Wisley Airfield. It looks like a nice and easy way to create more homes, but without taking into account the effect on the current community. The plan looks at a 20 year building development, with terrible consequences such as with a huge increase in road traffic on already busy roads. Why does this proposal keep being added back to plan, when it has already been heavily criticised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/3585  Respondent: 15455969 / Eloisa Latin  Agent:  
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Comment ID: PSLPS16/3587  Respondent: 15456129 / Jean Harding  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  
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I object to Wisley air field being developed with over 2000 new homes. It is too many in a very small village of outstanding natural beauty and green belt. I object to housing as the roads surrounding Ockham are narrow and already have too much traffic cutting through from the A3 & M25 junction 10. I object as there are no secondary schools that could cater for more children than it already does and certainly not hundreds as it could belt is extremely difficult to get into- The Howard of Effingham, the nearest school to the village.

I am a regular visitor to the village where I have grandparents living there, I hope this is stopped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The inclusion of 2100 homes on this site would present an unbearable strain on the existing infrastructure and completely alter the nature of the surrounding villages.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. I doubt that any of these homes will be truly affordable to local residents like myself and will lead to a further influx from surrounding areas and thus not meet the requirements of the local population.
- I object to the disproportionate allocation of housing in this particular part of the borough. 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC.
- I object to the threat the Local Plan poses to the historic rural village of Ockham. 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. This will cause an increased volume of car traffic on roads which are already congested. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas will have a significant impact on the quality of life for existing and future residents.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath's Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heath's SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3665  **Respondent:** 15456641 / Ross Studholme  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- I object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is not plausible. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3675  Respondent: 15456737 / Jane Cochran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The inclusion of 2100 homes on this site would present an unbearable strain on the existing infrastructure and completely alter the nature of the surrounding villages.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. I doubt that any of these homes will be truly affordable to local residents and will lead to a further influx from surrounding areas and thus not meet the requirements of the local population.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. At present cyclists are already endangered by the number and speed of cars passing through the area and this will do nothing to improve the situation.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads which are already congested. At present the roads are in a terrible state with numerous pot holes and the council seems to do little to maintain them.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. In addition the council seems to show no support for measures to reduce traffic on the roads such as the provision of school buses which were once in place but have now been terminated.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farms Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A35

Wisley:

I object to the Wisley site selection and approximately 2000 units proposed for the former Wisley Airfield. It is an over-development of the site and an over-development of the local area which will adversely affect already heavily congested local roads and puts strains on public transport infrastructure and local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/336  Respondent: 15457953 / Ian Symes  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3.1 Wisley

The Green Belt inset should not be expanded at Wisley there is no justification for this. It would be better to reduce the inset to make more defensible boundaries. This would also have the advantage of reducing the over-development of Ockham as described in Guildford Borough Council’s Wisley Appeal Statement of Case where GBC describes the Wisley development as a totally disproportionate attempted location of 2068 dwellings within the ancient village of Ockham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3742  Respondent: 15458273 / Laila-Marie Latin  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
density higher than most London boroughs. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3750  Respondent: 15458497 / Stephen Clennell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to all the GBC Plans and Proposals to build on Green Belt, most importantly the sites known as **Wisley Airfield/Three Farms Meadows** and the Woodland known as **Garlic Woods** on the Send/Ripley boarders.

Even the consideration of developing the FWA/TFM area – which would be a small town - with a potential population of 5000 plus – is clearly ludicrous.

The application should be **refused** once and for all on a whole host of grounds:

1. 4000 additional cars in the area
2. Effingham and Horsley stations overcrowding
3. Road casualty numbers and serious delays at Ockham Interchange
4. NO2 and CO2 pollution
5. Sewage problems
6. Water drainage – Already Ockham Road North floods – and Surrey CC seem impotent to stop it.
7. No secondary school places available in the area
8. Rural flora and fauna damage (SWT have recently butchered an area in The Forest (East Horsley) which was the environment of Wrens, Blue Tits, Black Caps and rabbits with seeming impunity
9. The ‘lungs’ of London – the green areas just outside this massive urban area - have to be sacrosanct.

Clearly people without any vision will only wake up when all the land within the M25 and ten miles outside is all concrete. Then, there will be difficulties with sewage inadequate water supplies and nowhere for flash-flood water to go except into people’s homes. Surely the cruel lessons in December/January in Cumbria 2015/2016 must be learned?

The only answer to Guildford housing requirement – and who, by the way, are these people who come up with a figure of 400/500/600 new homes a year?....These figures are never justified to the general public, - must be smaller developments throughout the Borough.

I do not just mean the occasional new house. I mean significant developments like the proposed 120 housing in Send Marsh. This will make significant contribution to housing requirement without any impact on the roads, sewage, water system etc.

As I have said new housing is necessary, but I think that GBC Planning department must move their mind-set into the 21st century. For example – why not decree that all new builds MUST be a minimum of three stories + a basement if a fourth is desired.

By definition, then, all dwellings will require a smaller footprint, which means that dwelling density can be greater and more can be built per acre.

Just finally, and returning to my reason for writing I have read and heard literally thousands of people with a whole host of reasons why the Wisley air field project should **NOT** go ahead.

I have YET to hear one clear, structured argument as to why it should.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The development proposed for Wisley Airfield would have a huge impact on the region, the roads and junctions are not suited to taking more traffic. The M25 and A3 junction is already one of the most polluted areas in Europe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3760  Respondent: 15459873 / Richard Horn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3766  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of...
pedestrian footpaths (and the space to provide them)
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
9) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
10) 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.
11) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7023  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings
I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:
1) 2) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
3) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

5) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

6) 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 subssumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

7) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

9) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

10) 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.

11) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is brownfield land in the urban areas which needs to be regenerated, without the need to encroach on so much protected Green Belt land.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The Green Belt serves a vital role in protecting against urban sprawl from London. Development on the Wisley site will potentially open the way to creating an urban corridor stretching from London to Guildford. Have exceptional circumstances been established to warrant removing the land from the Green Belt?

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high.

• I object to the disproportionate allocation of housing in this particular part of the borough. 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.

• I object to the threat the Local Plan poses to the rural village of Ockham. The plan will mean the village of 159 residences could be subsumed into a 2,000+ dwelling development.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

  2. The increased volume of car traffic. A proposed development of 2,068 homes could result in an estimated 4,000 additional cars on the roads.

  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25.

  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• Has sufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI)?

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers.
I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, will be removed from the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3768  **Respondent:** 15460417 / Michael Amor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• 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.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3698  Respondent: 15460417 / Michael Amor  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This still proposes to inset East Horsley from the Greenbelt. The development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham and Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to adequately meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land is land that was supposed to be protected for future generations.

Since Brexit, forecasts of increasing population numbers have been significantly reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3770  Respondent: 15460449 / Alexander Paton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3771  Respondent: 15460481 / Isla Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
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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.
• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

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   - I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   - 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.
   - I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
stretches from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
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Comment ID: PSLPS16/3780  Respondent: 15460705 / Samuel Crooke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:
Policy A35 Wisley airfield

The addition of point (4) under Requirements is supported.

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Comment ID: PSLPS16/3848  Respondent: 15461921 / Hazel Econs  Agent:

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Attached documents:

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Comment ID: PSLPS16/3894  Respondent: 15463009 / P M Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although there are many other aspects of the latest version of the Guildford Plan which have clearly not been thought out properly, I will not add to my list of objections at this stage, except for the outrageous issue which is the long standing Wisley Airfield site and the fact that despite a unanimous decision of the Council to turn down this Application, it has been allowed to remain as part of the Guildford Plan. This disgraceful decision is an assault on the electorate and unless speedily rectified will be indelibly engraved in the hearts and memories of voters. So you may take it that I also strongly object to any development of the Wisley Airfield site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/166  Respondent: 15463009 / P M Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site A35 Wisley Airfield
I object to the proposed increase to 95.9 hectares. The resultant increase in traffic volumes would be excessive on top of the existing traffic levels especially in Ripley where traffic is often at a standstill at morning and afternoon peak times. Newark Lane, in particular, cannot cater for any additional traffic and yet it would be the most likely favoured route for traffic to Woking from the Airfield development. Once again I object to the gross misuse of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2763  Respondent: 15463009 / P M Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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: PSLPS16/3895  Respondent: 15463649 / Joseph Davey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley can not cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSS!) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd ‘s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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Attached documents:

Comment ID: PSLPS16/3897  Respondent: 15463777 / Jade Broadhurst-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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: PSLPS16/3899  Respondent: 15463841 / Jessie Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Cou
- No Green Belt "exceptional circumstances"
- Not a brownfield site as stated - only 15% of
- Proposed SCC waste site
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath
- SANG would harm on
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic
- Housing density far too
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed 2000 houses at the Wisley Airfield site on the grounds that it is a totally inappropriate use of Green Belt and agricultural land. The location is served by country roads and to develop the infrastructure to accommodate access to the A3 will severely impact on the already congested and often gridlocked carriageway and also cause tailbacks to the surrounding country road networks. Drivers will no doubt use these as a 'rat run' and I suspect many accidents will occur.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4132  Respondent: 15474785 / Jules Widdowson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The development of the former Wisley Airfield does not take into account the effect on the local villages whose infrastructure would have to support it. This will undeniably bring a further increase in road traffic on already busy roads. The train station and its commuter links cannot support that level of growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4151  Respondent: 15475041 / Anne Geary  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and has objected against prior planning applications at this location. We consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly object to Policy A35 and will provide a more detailed submission outlining my arguments against this policy in a separate letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4166  Respondent: 15475649 / Joanne Smith  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

It should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4168  Respondent: 15475841 / David Boothby  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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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:** PSLPS16/4170  **Respondent:** 15476097 / William Boothby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –**

**Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4172  Respondent: 15476161 / Felix Boothby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure

...
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. This development represents greed of the most unpleasant kind.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This shouldn’t be in the plans for all the reasons that the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. Only 15% of the land is brownfield site land and it is simply too close to RHS Wisley and the Thames Basin Heath SPA. Increased traffic would no doubt aggravate traffic jams at the A3 roundabout and M25 Junction 10 and cause an unacceptable increase in pollution. The is no existing public transport and the stations are miles away. The housing density is far too great and over 2000 houses will swamp and destroy the Ockham conservation area, with an impact on listed buildings. The water table and surface water flooding has not been considered either for the site itself or for downstream areas of the River Mole. There will be a major impact on neighbouring villages, especially the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to Guildford Borough Council (GBC) Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brown field land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths, the lack of pedestrian footpaths and the space to provide either, together with the pitiful state of the existing highways, which are currently dangerous for cyclists.

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and demand for car parking at each station is already at capacity.

   - I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   - I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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   - I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2331  **Respondent:** 15479457 / Philip. L Earle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for a number of reasons including:

1. This is the least sustainable site identified in both the current and previous versions of the Local Plan because of the site constraints and location.
2. This site is further from railway stations than any other identified strategic site.
3. The site is adjacent to the most congested stretch of strategic road network (SRN) in the county and close to one the most congested junction in the country (M25 -J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (in peak times and also due to accidents, diversions, roadworks etc)
5. Suggested public transport initiatives including bus services to and from Guildford will exacerbate the already over crowded road network leading to unreliability and delay, which in turn will make local residents choose individual modes of transport resulting in further congestion.
6. Public transport bus services to Horsley will reduce the safety of the local road network as lanes are narrow and this will increase danger to cyclists and walkers which should be encouraged as eco friendly alternatives. The area is greatly used by cyclists at all times throughout the year who seek to follow the 2012 Olympic cycle route and train for the annual Ride London –Surrey 100 cycle event. The current plan will add to traffic flows and endanger cyclists and walkers lives.
7. The proposed site is adjacent to the Royal Horticultural Society gardens, which is one of the most visited destinations in the south-east of the country. I understand that expansion plans the RHS have will significantly increase the number of visitors to Wisley. From reading the plan, the resultant traffic increase from the RHS has not been considered. Furthermore, there are regular events at the RHS which attract 1,000’s of additional visitors and again the impact of this increase in traffic does not appear to have been taken into consideration.
8. Once completed, there will be minimal employment opportunities on the developed site as a result of which, the majority of new residents will travel to work. The majority of these are likely to use motor cars (probably with only a driver) and this will add significant volumes of traffic to the already over crowded local narrow lanes.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

Please note that I reserve my right to attend the inquiry and personally present evidence.

As a further over arching comment on local and government policy, I do not understand why more emphasis is not being given to long term investment in developing other parts of the UK. It is evident that the South East and the London conurbation in particular is over crowded. The answer is not to destroy the green belt but to encourage a shift in population to other areas which have been neglected by successive governments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4270  Respondent: 15479521 / Tim Meyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to the Local Plan as the development proposed will not be sustainable (Policy S1). The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. There is no evidence the development of 13,860 homes during the Plan period is sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from direct public transport links – there are no railway stations within easy walking distance and bus services across
rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport.

Greater consideration should be given to increasing the density of development in present urban areas, such as Guildford, where more practical sustainable transport options can be provided. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from significant congestion. Further vehicle movements will result in even more acute congestion and greater pollution and noise. Residents and the environment will suffer as a result.

2) I object to the Borough Wide Strategy (Policy S2).
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey at an apparent detriment to borough residents.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

3) I object to not protecting the Green Belt (Policy P2).
I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

Once villages are removed they are removed forever. Villages are a quintessential element of life in the borough – for the villagers themselves and for large numbers of people in areas surrounding the villages. Villages cannot be replaced with the sweep of the planner’s pen. Planning history is littered with failed attempts to create the unique character and life of traditional villages in a modern project. We have wonderful and meaningful villages and cannot afford to lose them. In fact, there are no plans to build new villages hence we cannot afford to lose our existing villages.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there are numerous brownfield sites in the borough with surplus land that could accommodate a further development.

4) I object to development in areas which are at risk of flooding (Policy P4).
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding. The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a Flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
There are many other sites in the borough not designated as flood risks that can be developed for housing and industry without such risks and without condemning families and business to highly likely flooding events and the inevitable disruptions and costs.

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. There is also brownfield site at nearfield Slyfield that is highly suited to industrial development. 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.

6) 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.

There is also brownfield site at nearfield Slyfield that is highly suited to industrial development. There is no evidence that industrial development in addition to that planned and possible in Slyfield is needed at Garlick’s Arch and that it would warrant a plan that does so little to meet the needs and desires of the local community.

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.

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. The ancient woodlands are an amenity enjoyed by many in the borough.

9) 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. The proposed development under the plan will cause greater congestion in and around our villages not just from the traffic created by the proposed developments but from the rat-running the proposed developments will encourage. 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 Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 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 village 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.

10) I object to the lack of proper infrastructure planning for sites (Policy I1).

Policy I1 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.

11) I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2).

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. It must not be a planning goal or consequence to make matters worse for residents of the borough.

12) I object to concerns of poor air quality (Policy I3).

Paragraph 4.6.27 of the Plan states “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.”

The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

13) I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43).

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3). Many residents in the borough would object to the removal of protection for these trees. 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. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

14) I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking would become through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 would go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

15) I object to the proposed Infrastructure Schedule (Appendix C).

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

16) I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough as being too high (Appendix D).

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford in general and in particular to the sites in the Proposed Plan. This local plan and the SHMA number have completely ignored these factors.

17) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

18) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

19) 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.

20) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the proposed sites, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

21) I object to the fact that environmental concerns are not taken seriously in the Proposed Plans. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. Noise from current traffic levels is already a significant nuisance in many areas and the plan would add further noise to existing residents and introduce many new families of the proposed new housing to this existing level of unpleasant or damaging traffic noise. It is not necessary since there are better sites to build on than along the main traffic arteries where noise would be an unwarranted nuisance to neighbouring residents.

22) 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.

23) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. It is more than clear that planning applications are unwarranted for all the many and detailed reasons given. Further such plans create an undue waste of public monies and are a serious distraction to residents who unfairly have to face over and over repeated threats to the enjoyment of residency in their borough.

I trust that these objections will be fully considered and 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: PSLPS16/4678  
Respondent: 15479681 / George Smith  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5613  
Respondent: 15479681 / George Smith  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

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:
Objections to Guildford Borough Council (GBC) Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brown field land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths, the lack of pedestrian footpaths and the space to provide either, together with the pitiful state of the existing highways, which are currently dangerous for cyclists
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and demand for car parking at each station is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

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   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already currently at full capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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 and the Horsleys 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 three villages maintained and the villages’ green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

    After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

    Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

    I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4284</th>
<th>Respondent: 15480257 / Karen L Woodland</th>
<th>Agent:</th>
</tr>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being completely ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The site will suffer from constant low level noise and extremely poor air quality.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The significant congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already currently at full capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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 and the Horsleys 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 three villages maintained and the villages’ green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like it to be noted my objection against the proposed home new town in the Surrey greenbelt and have my name and my husband's name added to the petition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4288   Respondent: 15480673 / Simon Broadhurst-Jones   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBE).

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10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows)- where the planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the environmental agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4287  Respondent: 15481281 / Simon Tolchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The disproportionate plan to build 2100 homes north of Ockham would take yet more land out of the Green Belt, which is unacceptable for the reasons outlined above. Greater pressure would be placed on local roads, including those in Effingham which are already congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4353  Respondent: 15482401 / Bernard Kelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the foregoing on grounds which include the following:

The Former Wisley Airfield should not have been removed from the Green Belt – the proposed development would create an urban corridor from London to Guildford. There are no exceptional circumstances justifying removal from the Metropolitan Green Belt. The proposed housing density will severely impact the nearby localities – Ockham, Ripley, the Horsleys and Effingham. In particular, the proposal will have a devastating impact on Ockham, a hamlet on open land, which would be subsumed into an area of high population density.
2 Further, the proposal would have an adverse impact on transport, local roads and road safety, and danger on the narrow local roads. Far from encouraging local cycling and walking, it would increase the danger.

3 There would be an increase in the already severe traffic congestion on the A3, M25 and some local roads.

4 There is a lack of local transport, and the local railway stations could not cope, while use of stations further afield would add to congestion and pollution. The risk of increased air pollution has not been properly addressed.

5 The area is a haven for wildlife, which would be seriously endangered.

In short, although this proposed development would undoubtedly benefit developers who are, I believe, operating out of a tax haven, I cannot see how it would benefit the area concerned. Although living in Cobham, I believe I have a greater interest in the area concerned than those living on the far ide 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>Respondent: 15482721 / John Austin</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I have worked at RHS Garden Wisley for nearly 10 years, and have lived in Surrey all my life, at contrasting locations such as Croydon, Dorking and Haslemere. I have personal experience of the housing market as a Surrey resident, as do my children. I earn below the national average income and choose to live here because it is beautiful, even if it means sacrificing some life-style choices. I do not want to see this area ruined and become suburban sprawl and a biodiversity desert. I have not seen prices in the rental and buying market rise very much at all over the last five years - indeed I believe they have just fallen following the brexit vote. The devaluing of the pound has suddenly made us an even more attractive market for foreign investment: this is trend does not support the apparent housing problem. We've yet to see the effects of the buy-to-let changes. The Green Belt is as necessary here as the parks are to London. I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development
   is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private
cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated
   4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas,
exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the
   lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further
   planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil
   secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
   development can proceed without significant infrastructure enhancements to the A3 and M25. Partial
   improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the
   proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the
   site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI)
   and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the
   borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate
   this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on
   the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) -
    where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL)
planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK,

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows),
Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft local plan for the following reasons-

I object to the detrimental effect on transport of so many extra cars. The roads are already overcrowded and congested and greater numbers would bring traffic to a standstill at busy times (rush hour & school arrivals & departures).

Added to which the East Horsley Station car park was already FULL by 10am on my last 3 attempts to find a place before the start of the summer holidays. Where do you go? There are no long term car parks in Horsley within reach of the station. Infrastructure must come first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I wish to object to the proposed Submission Local Plan.

Of most concern is the significant impact of more traffic on already busy narrow local roads. The roads in the Horsleys area are basically narrow, winding country lanes, already busy at peak times and will not be able to cope with the additional high volumes of traffic the developments would create, especially the major one at Wisley airfield. Additional major concerns include moving the boundaries of the Green Belt, lack of sustainability of the developments and inadequate proposed improvements to local infrastructure especially medical facilities and schools. The proposed developments are out of character with the village nature of the Horsleys and, particularly, the density of the new housing will contrast starkly with the existing settlements.

LAND AT FORMER WISLEY AIRFIELD

I wish to object specifically to the above proposed development. It breaches Green Belt rules, will have major adverse impacts on the natural environment including wildlife, local traffic and infrastructure as well as resulting in a development which is total out of character with surrounding settlements and lacking in the fundamental tenets of sustainability. The housing density of the proposed new development would be roughly 6 times as dense as the existing local settlements.

My major concern is the lack of suitable additional travel infrastructure in the proposed development will make the car the first choice of transport – probably another 4000+ cars and associated journeys - adding to the already serious traffic queues experienced around the M25/M3 junction, already of concern to Highways England. Effingham Junction and East...
Horsley rail stations do not have sufficient parking to accommodate the extra cars and vehicles are already now parking on Effingham Common Road as the station car park is regularly full.

The site falls within the Metropolitan Green Belt and, as such, should only be developed if the proposal meets “very special circumstances”. The proposal singularly fails to demonstrate that the benefits of the development outweigh the harm to the Green Belt and other aspects noted above. The development would create the largest settlement in Guildford Borough after Guildford itself, and be the inevitable precursor to further development of the Green Belt and spread of suburban London outside of the M25.

Both Ockham & Wisley Commons lie within an area designated as a Site of Special Scientific Importance (‘SSSI’) and forms one part of the Thames Basin Heaths Special Protection Area. A large percentage of the site lies within the 400m Exclusion Zone where new building is effectively prohibited. The impact of such a large settlement and associated pets will inevitably have a detrimental impact on the local wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
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• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4477  Respondent: 15485857 / Emily Nicholls  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE 2016 DRAFT LOCAL PLAN!??

I am only 12 years of age and I do not want to grow up in a busy, polluted area. I like to feel safe in my environment which I currently do as my village is small and friendly with lots of fields to play on with my friends. If 2000 more homes, industrial and business sites and a railway station are added to my surroundings I will not feel so happy as millions of people would be traveling through my area every week. This will not only hurt me but many others of my similar age too. If we are to go through with this plan it will result in 5000+ more vehicles on our roads causing pollution in our currently clean area. Building on the Green Belt will mean thousands of animals losing their homes and possible extinction in some species. This will also harm the bees which I know we are trying to look after at the moment due to low numbers. I know this sounds extreme but it could even put us at risk!

YOU DON'T WANT TO LOSE THE GREEN BELT FOR EVER DO YOU?

I OBJECT TO THE 2016 DRAFT LOCAL PLAN!??

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4498  Respondent: 15486081 / Rosie Ainsworth  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4509  Respondent: 15486177 / Daniel Peyton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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: PSLPS16/4519  Respondent: 15486305 / Noel Ainsworth  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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: PSLPS16/4536  Respondent: 15486849 / Eric Waestaff  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4684  Respondent: 15487009 / Yvonne Peyton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4683  Respondent: 15487041 / S Comfy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/4682  Respondent: 15487105 / Keith Pew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4560  Respondent: 15487233 / Lindsey Schravetta  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/4676  Respondent: 15487265 / Helen Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/4674  Respondent: 15487329 / Adam Sadler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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**Comment ID:** PSLPS16/4673  **Respondent:** 15487361 / Roger Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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**Comment ID:** PSLPS16/4671  **Respondent:** 15487425 / B Pryor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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**Comment ID:** PSLPS16/4670  **Respondent:** 15487457 / Aidan Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4644  Respondent: 15488129 / Alan & Barbara Maddows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings"

Although we live outside the borough of Guildford, we have a greater interest in what goes into the Guildford Local Plan than those living on the far side of the borough. With this in mind we would like to object most strongly to the Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings with the following reasons:

• We object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
• No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
• There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
• We object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
• We object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
• The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
• We object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
• The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
• Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
• The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

• We object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

• We object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

These objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified these serious concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPS16/4691  **Respondent:** 15495201 / Viliv Viana  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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**Comment ID:** PSLPS16/4716  **Respondent:** 15495233 / Harriet Philips  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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**Comment ID:** PSLPS16/4724  **Respondent:** 15495265 / Stephen McGuckin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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I object to the proposed development on the site of the former Wisley Airfield.

The Spatial Vision notes…. 'Not all of the borough’s development needs can be met within Guildford’s urban areas. It is therefore proposed to focus some development on large strategic greenfield sites which brings with it significant infrastructure.'
Please can you explain what significant infrastructure is available at the site of the former Wisley Airfield where you propose to create a new town.

As already observed, very little development will take place within Guildford’s urban areas. Nevertheless, two new rail stations are planned, Guildford East (Merrow) and Guildford West (Park Barn), presumably to support the additional 2,742 homes planned for Guildford. However, the new town planned for Wisley will be expected to use already over-extended stations at Horsley and Effingham Junction. In excess of 2500 new homes (including those planned for the Horsleys) are proposed without any additional infrastructure beyond the addition of bus routes and a cycle path.

Assuming there is significant infrastructure that could make the former Wisley Airfield a candidate for development, I would still object to this proposal based on the level of detail provided in the plan. This proposal is a very significant intrusion into the green belt and the level of associated planning seems minimal. For example, the plan suggests the need for “…a significant bus network to serve the site and key destinations including Effingham Junction railway station and/or Horsley railway station”. However, the existing roads (commonly referred to as lanes) are insufficient to accommodate two buses passing, never mind a ‘significant bus network’. The consequences of this development will lead to very significant additional infrastructure work that is currently not envisaged in the plan and which will have a much wider impact on the green belt.

In short this proposed development can never be supported until a comprehensive and detailed plan is developed with a model showing how

- The current, very poorly maintained, road infrastructure will be impacted
- the Horsley and Effingham railway stations will be impacted
- the existing schools and medical facilities will be impacted
- disruption will be minimised for existing residents while such an extensive multi-year development proceeds
- the very real flood risk will be over come
- the designated Site of Nature Conservation Importance will be protected
- listed buildings will be protected
- funding will be secured from multiple agencies over a multi-year budget cycle
- air quality will not be reduced
- the model should also illustrate the impact if (and surely when) the 2000 homes become 3000 and then 4000.

Of course, without a fact based explanation as to why the housing stock must increase by 25% (refer to Objection 1) it is not clear that this development is even needed.

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 A35

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Comment ID: PSLPS16/4750  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

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Comment ID: PSLPS16/5127  Respondent: 15495617 / Peter Elliot  Agent:

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Comment ID: PSLPS16/5129  Respondent: 15495681 / Pippa Mathews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/5130  Respondent: 15495777 / Michael Lowe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4760  Respondent: 15495809 / Katie Critchlow  Agent:

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Comment ID: PSLPS16/5131  Respondent: 15495841 / Nicholas Fox  Agent:

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I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/5141</th>
<th>Respondent: 15496225 / Tasha Hemmings</th>
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9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4806  Respondent: 15496321 / S N Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

Whilst I do not live in the borough of Guildford I do none the less have a very deep interest in the area as I live on the borders and in particular live close to the Wisley site and as a result have an in depth knowledge and respect for this area. I am therefore writing in connection with the above draft local plan to which I wish to express my objections for the following reasons:

- I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. The Green Belt was set up specifically to prevent this kind of urban expansion.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- I object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
• I object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

• I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We wish to record our objection to the inclusion in the Guildford Borough Council draft Local Plan (June 2016) of the former Wisley Airfield as a potential development site. This site is Green Belt land and there is no need for its development as there are brownfield sites in urban areas that could be regenerated.

A development of 2,000 dwellings would have a significant effect on the surrounding villages, towns and roads. We live in Cobham and this would be the site’s nearest shopping centre. Cobham is already congested and there is insufficient parking.

The environmental effects of increased traffic have not been given sufficient consideration. Air quality would be affected and this site and areas around it have significant ecological value.

The application no. 15/P/00012 was unanimously rejected by Guildford Council Planning Committee in April 2016 so it is unsettling to see the site included in the Draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPS16/4811  Respondent: 15496609 / Dena Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/4816  Respondent: 15496897 / Iris Watts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I chose to live here because it is a village

Wisley airfield? Well we are back to URBAN SPRALL  again, again, again!

Far too many house because we all know that the house will be built because there is profit in them for the developers but the schools, medical facilities will be quietly put on the back boiler & conveniently forgotten

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5118  Respondent: 15496929 / M Cozens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/4819  Respondent: 15496961 / Felix Jeffreson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Whilst the proposal for 2000 houses at Wisley does not directly affect Horsley residents, it will surely increase traffic through the Horsleys and therefore the A3 and A246, both of which suffer regular congestion.

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Comment ID: PSLPS16/4861  Respondent: 15497601 / Ben Hicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4880  Respondent: 15497761 / N Wadey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4899  Respondent: 15497889 / Hugo Wadey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4908  Respondent: 15497953 / Rebecca Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4913   Respondent: 15498017 / Hester Challis   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings

I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt. There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

I object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham and also the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.

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I object to insufficient ocnsideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/4915  Respondent: 15498049 / Natasha Howard  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4917  Respondent: 15498081 / Laura Jordan  Agent: 

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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: 15498401 / Anna Garfield</th>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I am a frequent visitor to the borough, working in Guildford and visiting relatives in Ockham where I grew up. I am writing to object to the draft Local Plan for the following key reasons:

1) There is plenty of brownfield land in the borough which should be regenerated before Green Belt land is even considered. I therefore object to the plan for such a huge amount of new housing to be built on Green Belt land.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. Development on the site will create an urban corridor stretching from London to Guildford. I don't believe there are any exceptional circumstances which warrant removing the land from the Green Belt under the NPPF.

3) I object to the excessively high number of houses to be built per year -693. This is more than double the figure used in previous plans and there is no clear reason for the dramatic increase.

4) I object to the threat to the village of Ockham and the blight on properties there. The plan calls for a small 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.

5) I object to the negative impact on transport, local roads and road safety. I specifically object to:

   1. The suggestion that the development will result in a meaningful shift to cycling and walking. The development is too isolated for people to give up their cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads.
   6. The lack of suitable public transport. The Guildford Waterloo rail route is already hugely overcrowded and cannot cope with the proposed increase. Car parking at the stations is already at capacity.

6) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) when the planning application has already been rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I request that these objections are fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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<th>Comment ID: PSLPS16/5035</th>
<th>Respondent: 15500769 / A L Tozer Ltd (Laurence Dawson)</th>
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I am an owner and director of an international horticultural business in Cobham which owns land in Cobham and Ockham. Our Ockham site is very important for the development of the business and there are regular movements between the two sites of Tractors and cultivation and/or harvesting equipment. We also have vehicle movements between the two sites moving commercial stock.

I object very strongly to the re-inclusion of the Former Wisley Airfield/ Three Farms Meadows site into the Borough Local Plan after it was rejected as a suitable site for housing by the full planning committee and the planning department of the Borough.

I object to the plan’s proposal to remove the Wisley airfield / Three Farms Meadows from the green belt and we also strongly object to the similar proposals to build on green field sites in the Parish’s of East and West Horsley, Send and Ripley, and to the removal of these parish’s or parts of them from the Green Belt.

We object to the loss of the Agricultural land at The Farms Meadows through the proposed development there. Good agricultural land is a declining resource.

I object to the proposed development of the various sites in the parish’s of East and West Horsley, Ockham, Ripley and Send because they cannot happen without a big investment in services and this major requirement is hardly mentioned. Already the district is struggling with overflowing sewerage, with shortages of other utilities of Gas, water and electricity supplies. There is already a desperate shortage of school places for all age groups in this area of Surrey; Medical services are also fully stretched and inadequate for more clients. The Hospital will need to expand too.

I object to the proposals to increase the number of houses in this area by such a large amount on an annual basis. The road infrastructure is inadequate. The roads were developed in the days of the horse and cart, are narrow and cannot be widened easily because they are bounded by hedges. There are few footpaths and no cycle lanes or lighting. The mix of pedestrians, cyclists and ridden horses with fast cars and trucks are a recipe for disaster and litigation if no planning consideration was made. Due to the high traffic movements and the high number of goods vehicles using these lanes they are now breaking up. The area has some of the worst roads in the county.

I object strongly to the development because of its likely affect on the Wisley and Ockham commons, part of the Thames Basin Heaths Special Protection Areas, particularly considering atmospheric pollution, increased footfall and dog exercising on these fragile environments.

I object to the planning department, the planning committee and their subcontractors in devising a housing need without consideration and planning for the infrastructure needed to establish their proposals.

I strongly object to the proposals because of the effect on the picturesque villages which have a high number of old and historic houses, many listed. The proper development of The Borough should be to increase the number of high rise buildings in the centre, now that Guildford is a city, with schemes such as the station development, lesser rise building should be encouraged in the suburbs of Guildford.

We object to the lack of planning for work and employment for the residents of these developments. They cannot all take the train to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/5048</th>
<th>Respondent: 15501217 / Luke Sarti</th>
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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

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I OBJECT to the inclusion of A35 Wisley airfield in the local plan. The principle of the local plan is a presumption in favour of sustainable development. The Housing and Planning Act 2016 grants permission in principle to any development included within the local plan leaving only technical details to be considered by planning authorities. The site at Wisley failed in its planning application on a large number of points including infrastructure and sustainability. It is highly unlikely that these will be met in the future due to its positioning. Part of the site is green belt and no exceptional circumstances have been demonstrated. Aspects of the site also include high quality agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the
plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample
brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt
land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in
protecting against urban sprawl from London. Development on the site will create an urban corridor stretching
from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing
the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment
(SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than
double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the
Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is
allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development
       is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private
cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated
       4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas,
       exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the
       lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further
       planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil
       secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
       development can proceed without significant infrastructure enhancements to the A3 and M25. Partial
       improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the
       proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site,
in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site
of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough,
and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this
situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the
Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/5067  Respondent: 15501313 / Matthew Dougherty  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

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Comment ID: PSLPS16/5087  Respondent: 15501377 / Elmbridge Borough Council (Karen Randolph)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Policy A35- Land at Former Wisley Airfield, Ockham

In regards to the proposed new settlement at Wisley (Policy A35), many of the concerns we previously raised have now been addressed through the publication of additional evidence base documents e.g. Habitats Regulation Assessment and Draft Infrastructure Delivery Plan, and by way of the evidence and statutory responses submitted in regards to the two planning applications for this site. The Council would however, like to reiterate those comments which it considers to be outstanding as well as make some additional comments in light of the publication of the Proposed Submission Plan and supporting evidence base.
Due to the location of Wisley Airfield in relation to Elmbridge Borough, this site is of keen interest to us and our residents and so, we continue to query whether this is the right location for this scale of growth when considered against the principles of Green Belt. The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. The site is located in the very north west of the Guildford Borough where the Green Belt is already very fragmented and particularly vulnerable to additional development, a point that was noted by the Inspector for the examination into our Core Strategy. It is therefore considered that further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location.

In addition, we would like to understand further the process for considering the eire. 100, parcels of Green Belt and countryside that were considered to have low or medium sensitivity and how the work has resulted in this site, as opposed to other areas, being proposed for allocation. Working our way through the various Volumes and Addendum it would appear that Guildford Borough Council has been selective in assessing the environmental capacity and sustainability of the parcels and we query why only those parcels on the edge of the urban edge were considered. Furthermore, Parcel G18 (Wisley) is not located next to the urban edge and therefore in accordance with this general approach, should have been excluded for further consideration as have other similar parcels.

Turning to the Proposed Submission Plan, we would recommend that Table 1 - Planned Delivery between 2018 and 2033, be amended to show more clearly when it is envisaged that each strategic allocation would be delivered rather than generically stating the period of 1 - 15 years. Our concerns regarding the impact on the strategic road network remain, particularly in regard to the proposed development at Wisley but also other proposed development sites along and in close proximity to the A3. For example, Policy A43 Land at Garlick's Arch, Send Marsh / Burnt Common and Ripley which will further compound the impact on the road network should the appropriate mitigation measures not be implemented. Without the mitigation measures identified in the Government's Road Investment Strategy (RIS) (phases 1 and 2) the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe. As set out in the evidence base, the RIS schemes are complicated and may involve land acquisition and planning permission and, as a result, Highways England is cautious about programming these schemes. Given these complications, and also the infrastructure required on-site to support the scheme and the securing of the land north of the site for Suitable Alternative Natural Greenspace (SANG) (in regard to the Wisley scheme), it is considered that the Borough Council could provide a better estimate in terms of delivery knowing that the development of some sites is unlikely to be in the first few years of the plan.

I hope you find these comments useful in progressing work on the Local Plan.

Please do not hesitate to contact Mark Behrendt, Planning Policy Manager, if any of the points raised requires further explanation. Officers would be happy to meet with you to discuss our comments in more detail.

At this time the Council would like to reserve the opportunity to attend the examination in public.

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<td>( ), is Sound? ( ), is Legally Compliant?</td>
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I OBJECT to Wisley Airfield, which is classified as a brownfield site on a spurious technicality when everybody can see that it is not what is understood by brownfield, being included in the Local Plan as a development site for 2000 houses when Guildford Planning Committee have just refused the planning application relating to it. Either the left hand does not know what the right hand is doing or this is a devious diversion. I object for all the reasons identified by GBC Planning Committee when it rejected the application.
I OBJECT to building 2000 houses at what GBC calls Wisley but is actually at Ockham, because it would massively and detrimentally overwhelm Ockham village, East and West Horsley and the entire neighbouring area. The proposal is ill conceived, showing scant regard for the Green Belt, infrastructure requirements, transport, or pollution and lacking nearly all the evidence that is needed to show that such a development would be sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5108</th>
<th>Respondent: 15502529 / Michael J. Marsden</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the above draft local plan for several reasons, but on three specific areas of concern.

(1) The removal of the former Wisley Airfield from the Green Belt which has assisted the prevention urban sprawl from London. Development of this land would create and urban corridor from London Guildford. There are ample Brownfield sites where future housing developments might be considered.

(2) The road infrastructure anywhere close to the M25 and the A3 is already at breaking point. It is not at all unusual for queues of traffic to stretch from the A3 back through Cobham, and on those frequent days when there are significant delays on the M25 between the Leatherhead turnoff and the Wisley junction, traffic queues can and do stretch back beyond Stoke D'Abernon towards Leatherhead.

Bearing in mind that access to Cobham and Stoke D'Abernon station from Wisley would be along the A3 and through Cobham, an increase in traffic would add significantly to the current delays.

In the past three to four years, there has been a daily increase in the number of cyclists using the local roads, and this too has lead to more and more crawling traffic through Cobham, which does not help anyone in a hurry to get to the Cobham station.

(3) Any additional housing would lead to a further increase in the number of cars using the local roads. The proposal to build circa 2000 houses on the Wisley Airfield site would increase daily car usage to between 2000 and 4000 vehicles which would lead to further delays and frustration for all road users.

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: PSLPS16/5110</th>
<th>Respondent: 15502753 / Tozer Seeds Ltd (Steven Winterbottom)</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 represent the owners of an international horticultural business in Cobham which owns land in Cobham and Ockham. Our Ockham site is very important for the development of the business and there are regular movements between the two sites of Tractors and cultivation and/or harvesting equipment. We also have vehicle movements between the two sites moving commercial stock.

We object very strongly to the re-inclusion of the Former Wisley Airfield/ Three Farms Meadows site into the Borough Local Plan after it was rejected as a suitable site for housing by the full planning committee and the planning department of the Borough.

We object to the plan’s proposal to remove the Wisley airfield / Three Farms Meadows from the green belt and we also strongly object to the similar proposals to build on green field sites in the Parish’s of East and West Horsley, Send and Ripley, and to the removal of these parish’s or parts of them from the Green Belt.

We object to the loss of the Agricultural land at The Farms Meadows through the proposed development there. Good agricultural land is a declining resource.

We object to the proposed development of the various sites in the parish’s of East and West Horsley, Ockham, Ripley and Send because they cannot happen without a big investment in services and this major requirement is hardly mentioned. Already the district is struggling with overflowing sewerage, with shortages of other utilities of Gas, water and electricity supplies. There is already a desperate shortage of school places for all age groups in this area of Surrey; Medical services are also fully stretched and inadequate for more clients. The Hospital will need to expand.

We object to the proposals to increase the number of houses in this area by such a large amount on an annual basis. The road infrastructure is inadequate. The roads were developed in the days of the horse and cart, are narrow and cannot be widened easily because they are bounded by hedges. There are few footpaths and no cycle lanes or lighting. The mix of pedestrians, cyclists and ridden horses with fast cars and trucks are a recipe for disaster and litigation if no planning consideration was made. Due to the high traffic movements and the high number of goods vehicles using these lanes they are now breaking up. The area has some of the worst roads in the county.

We object to the proposed development of the Former Wisley Airfield on health grounds in that the site is very close to the major trunk roads of M25 and A3 and junction 10 of the M25. I have personally experienced discomfort due to the air pollution engendered by the traffic when walking on Ockham Common which is very close to the site when the wind is from the North round to the South East.

I object strongly to the development because of its likely affect on the Wisley and Ockham commons, part of the Thames Basin Heaths Special Protection Areas, particularly considering atmospheric pollution, increased footfall and dog exercising on these fragile environments. We object to the cavalier attitude of the planning department, the planning committee and their subcontractors in devising a housing need without consideration and planning for the infrastructure needed to establish their proposals. If it were a business making such poor plans they would quickly lose their money and become bankrupt. We object as taxpayers that we would have to bear the financial consequences of the planning incompetence’s.

We strongly object to the proposals because of the effect on the picturesque villages which have a high number of old and historic houses, many listed. The proper development of The Borough should be to increase the number of high rise buildings in the centre, now that Guildford is a city, with schemes such as the station development, lesser rise building should be encouraged in the suburbs of Guildford. We object to the lack of planning for work and employment for the residents of these developments. They cannot all take the train to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wisely Airfield Allocation Site A35

5.7 This proposed redevelopment site would provide 2,000 new homes as part of a larger mixed use scheme. There are however significant concerns that this site is unsuitable in planning terms, particularly regarding the strategic highway network.

5.8 The NPPF is clear that plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The site is manifestly not sustainable, it is not related to any existing settlement or infrastructure or local services. Indeed it is located in open countryside, remote from any settlement infrastructure. Development of this site would constitute a major housing development in a rural area which will rely upon car based travel to and from given the proposed access on to the A3 which is not conducive to encouraging modal shift to non-car based transport.

5.9 The inherently unsustainable location of this site means that its development as a major housing and employment site will conflict with the policies of the Framework. An Inspector will have to give very careful consideration as to whether it constitutes the most suitable location for the proposed form of development. The site is also the most contentious proposed allocation in GBC’s plan. Its suitability for major development will need to be very carefully scrutinised.

5.10 In the light of the potential deliverability issues displayed by some of the most significant strategic sites identified in the Plan, as well as GBC requiring yet further sites to meet its OAN of 693 dwellings per annum, there is no justification to not consider the land at Fairlands for development. The site is suitable, available and deliverable now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5212  Respondent: 15503617 / Stephen Roy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5218  Respondent: 15503649 / N Ord  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5224  Respondent: 15503777 / Elya Koudou  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/5238</th>
<th>Respondent: 15503969 / Katy Denham</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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**New Settlement at Ockham**

I strongly object to the proposal to use farm and previously requisitioned land at Ockham for 2,100 houses. The impact on my village would be enormous and unsustainable. Planning permission has recently been refused for numerous reasons and the site should therefore be removed from the Plan.

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: PSLPS16/5242</th>
<th>Respondent: 15504097 / Michael Taylor</th>
<th>Agent:</th>
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I am writing to object to your draft Local Plan of June 2016 relating to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt and there is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs. In addition, Hatchford, south of the M25, has some 60 residences off the narrow Ockham Lane that would be greatly affected by the proximity of development.

I strongly object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development. The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions. Also, owing to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes). There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.

The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
Also, insufficient consideration is being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

My objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads which cannot support the current flow of traffic and the surface water which does not drain away

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. The wide vehicle cause damage to the narrow country lanes

4. The danger this traffic will be to local cyclists, pedestrians and horse riders due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport and roads that a large bus can safely travel on. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

   • I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   • I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   • 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.
   • I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I believe there is a planning application in and I would like to raise our families objections to until we have certain guarantees and questions have been answered.

Why is such a large development required? Why could not a series of smaller developments be done that would not be so catastrophic on small villages but instead gradually increase their size so as not to break to eco system of that community.

Why are urban brownfield sites not being considered instead? I agree we need to provide housing in the SE of England but this is a huge development that would change the human and natural ecosystems of the area.

We need some assurances that if this goes ahead there will be additional schools built, both junior and senior, nurseries funded because we are talking about 1000's of additional children and the current schools can't cope nor do we need to have mega schools with masses of classes per year.

Roads - what additional road widening, traffic control measures, new roads are going to be built to cope with the traffic? Cobham traffic is already a joke because the parking bays prevent cars from going through but now this development would add to those queues without any considerations of the issues we have already. There simply isn't the parking spaces nor the volume of shops to cope with that number of additional people. What is to be done?

Travel - the local train services cannot support this type of development, assuming this means there is an additional 1000 per day who travel into London, how many extra trains are SW going to put on, will they be doing fast trains as well as slow trains like they do at Woking? There isn't enough parking at any of the trains along the line to cater for these additional people, there is never more than 30 spaces free at Cobham in any one day. If you think people are going to be able to walk to these stations then that is a joke because some roads in the local area don't have pavements, in fact an extraordinary number dont so how are people expected to walk safely to these stations?

I don't object to building more houses but I do strongly object to large developments without considered planning of the impact on other communities and their current way of living. This would have a serious impact on my way of living and would mean Cobham is no longer the place I bought into as it would take longer to get around, less certainty about where to shop, where to park, whether I would get a parking space at the station, time to travel to work etc. Do this in a considered way with more disperse developments spread around the area and it's less impactful.

Please acknowledge this email so that I know it has been logged as a formal objection.

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: PSLPS16/5322</th>
<th>Respondent: 15505377 / Simon Wright</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Comment ID: PSLPS16/5328  Respondent: 15505409 / Ian Cunningham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5335  Respondent: 15505537 / Vincent Carley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5341  Respondent: 15505601 / Emma Robson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5346  Respondent: 15505633 / John Hume  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

For almost twenty years I have been a regular visitor to the beautiful greenbelt village of East Horsley and its neighbouring communities and villages. I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5347  Respondent: 15505633 / John Hume  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a regular visitor to East Horsley and its neighbouring communities and villages I was horrified to hear of the proposed development at Wisley Airfield in what is the heart of greenbelt land. Having witnessed the many developments that have already had in my opinion a negative impact on the beauty of this wonderful part of Surrey, this development is totally out of character and will without doubt spoil what has always been a protected untouched halcyon of days gone by. To say that the proposed development would be grossly out of context is a definite understatement. I trust that Guildford Borough Council will have the common sense to reject this application which would be much better suited to some of the many brownfield sites crying out for redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6927  Respondent: 15505633 / John Hume  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a regular visitor and former resident of East Horsley, I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor...
stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
As a regular visitor to East Horsley and its neighbouring communities and villages I was horrified to hear of the proposed development at Wisley Airfield in what is the heart of greenbelt land. Having witnessed the many developments that have already had in my opinion a negative impact on the beauty of this wonderful part of Surrey, this development is totally out of character and will without doubt spoil what has always been a protected untouched halcyon of days gone by. To say that the proposed development would be grossly out of context is a definite understatement. I trust that Guildford Borough Council will have the common sense to reject this application which would be much better suited to some of the many brownfield sites crying out for redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

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   - I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

   - 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.

   - I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

Comment ID: PSLPS16/5487  Respondent: 15505761 / James McMarken  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5351  **Respondent:** 15505793 / Edward Goddard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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: PSLPS16/5362  **Respondent:** 15505921 / Andrew Forest  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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: PSLPS16/5486  **Respondent:** 15506017 / Steven Ponsford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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: PSLPS16/5368  Respondent: 15506049 / Mandy Shoesmith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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: PSLPS16/5488  Respondent: 15506081 / Dale Miller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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: PSLPS16/5490  Respondent: 15506113 / Sheila Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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Attached documents:

Comment ID: PSLPS16/5495  Respondent: 15506433 / Geoffrey Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5385  Respondent: 15506465 / Lisa Garner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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: PSLPS16/5391  Respondent: 15506625 / Ian Toft  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/5404  Respondent: 15506657 / Teresa Laroche  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/5433  Respondent: 15506881 / Chloe Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/5449  Respondent: 15506913 / Nicholas Mann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/5509  Respondent: 15507489 / K Garner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5539  Respondent: 15507617 / Ewan Collens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5547  Respondent: 15507649 / Nick Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy A35 Wisley. I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee unanimously rejected a recent planning application for precisely this development on 14 separate grounds. However, the site had been reinserted into the new draft local plan published only 24 hours before the planning decision. There is no need for housing on this site because the local plan housing target is incorrect &inflated and ignores constraints.
This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

Green Belt location and absence of “exceptional circumstances”.

Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.

Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).

Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

Absence of adequate traffic data.

Loss of high-quality agricultural land (55% of the site), in breach of national policy.

Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.

Presence of a Surrey County Council safeguarded waste site.

Cost of infrastructure required to the detriment of alternative more favourable sites.

Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.

Impact on listed buildings.

Extreme housing density with tiny garden spaces.

Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15507713 / Yvonne Connolly</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5612  Respondent: 15507745 / M Grainger  Agent:

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Attached documents:

Comment ID: PSLPS16/5614  Respondent: 15507809 / M Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPS16/5615  Respondent: 15507841 / Mark Fenner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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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: PSLPS16/5574  Respondent:  15508321 / Anne Tyson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The removal of the former Wisley Airfield from the Green Belt which serves a vital role in the prevention of London sprawl.

No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.

The Local Plan as drafted poses a threat to the historic rural settlements of Ockham, Hatchford and Downside.

The potential harmful impact on transport, local roads and road safety by this suggested development. The result of an additional 2,000 homes could result in an estimated 4,000 more cars, plus other vehicles to service the development.

Such increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham.

The absence of cycle paths and footpaths renders the assertion that the development would result in a shift to using cycles and walking is not viable.

There would be an increase in the existing severe congestion on the Strategic Road Network of the A3 and M25. Also any proposed secondary school would add to this congestion.

There is not sufficient capacity at all the local railway stations to accommodate further large increase in passenger traffic and parking facilities.

Air quality issue does not seem to be given sufficient consideration; near the M25/A3 junction, it already exceeds EU-permitted levels.

These and other objections are supported by the unanimous rejection of application 15/P00012 by the Planning Committee at Guildford Borough Council on 8th April 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5607  Respondent:  15508961 / Abby Allen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I object to the development of Wisley Airfield as this site is mostly Green Belt with a very small section of brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3880  Respondent: 15508961 / Abby Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The continued inclusion of the Wisley airfield as a site for housing. This is an inappropriate location due to many reasons including transport links, infrastructure (such as schools, doctors etc) environmental protection and its impact on the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5643  Respondent: 15568417 / Leslie Healey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings
I object to the draft Local Plan for the following key reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to totally OBJECT to the continued inclusion of the former Wisley airfield now known as Three farms meadows as a strategic site in the local plan. I object to the total destruction of the historic village of Ockham where I have lived my whole life. The station, small lanes, schools, doctors surgeries and general layout of Ockham is not suitable in the slightest for this massive encroachment on the green belt, they are already at maximum capacity. It would ruin every part of living in Ockham and the beautiful countryside surrounding it which we should preserve for future generations. This would be the greatest disruption to the green belt in the entire country and this is why I completely object to over 2000 houses being built in my village.

To summarise I once again want this development out of the local plan and totally object to the continued inclusion of the former Wisley airfield now known as Three Farms Meadows as a strategic site in the local plan.

Please take my reasons into consideration and understand what massive destruction this would cause to not only the people that live in Ockham but all the surrounding villages.

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>PSLPS16/5645</th>
<th>Respondent:</th>
<th>15568481 / Sam Attard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></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 would like to object to GBC’s Proposed Submission Local Plan unreservedly. As a local resident I have objected to all the proposals the GBC has put forward along with thousands of others in our area. It really is appalling that our objections have been completely ignored and the Local Plan has failed in the number of key areas to take into account or to answer our valid comments and criticisms submitted by thousands of residents and organisations in respect of the previous 2013 Draft Local Plan. What is the point of us all objecting whole-heartedly if we are just ignored. I have to say that in my opinion it raises questions about your governance and vested interests.

The meeting on 8th April regarding The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Ref: 15/P/00012) was unanimously rejected by GBC following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

(a) was an inappropriate development within the Green Belt;

(b) would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;

(c) failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;

(d) failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;

(e) was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.

(f) would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;

(g) failed to deliver the required transport sustainability measures;
I object very strongly to the submission of the local plan, on the above reasons, specifically for The Three Farm Meadows (the former Wisley Airfield).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5646  **Respondent:** 15568513 / Don & Jo Ecclershall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Council draft Local Plan Site Allocation A35 Former Wisley Airfield

We wish to object to proposed development for the following reasons:-

1. The removal of the site from the green belt.
   1. No exceptional reasons are given for the action in 1. above.
   2. Generous amounts of brownfield land is available in urban areas.
   3. The nearby villages of Effingham, Ripley, Ockham and the Horsleys will be severely affected.

5. Ockham with only 159 residences will be completely overwhelmed by 2000 dwellings up to 5 stories high.

6. Hatchford with 60 dwellings off Ockham lane would be severely affected. 2000 additional dwellings with -overtime- say 4000 cars will have very significant effects on local and main roads including safety. The A3 is often blocked by cars queuing to exit onto the M25 causing tailbacks and some “shunts”.

8. At present the roads through and around Cobham are often blocked at peak times.
   1. There is very little provision of cycling and footpaths and the increased traffic would make these activities extremely dangerous.
   2. The local rail stations could not cope with large increases in traffic and of course the car parking facilities are already over capacity/11. Air quality is of vital importance and due to the existing traffic and the number of planes this is vital and has not been given proper consideration.
3. Insufficient consideration is given to the existence of SPA, SSSI, and SNIC sites.

!3. This development was unanimously rejected by the Planning Committee on 8th April 2006 and this should be repeated for the new application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5657  Respondent: 15569153 / Daniel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is wrong to build on green belt land, destroying the countryside and natural habitats which are home to endangered wildlife.

It is wrong to take the population density of the area to the proposed level, which is higher than the majority of London boroughs. Five storey developments do not suit the area, and besides, the area does not have the infrastructure to support such a high density of residents.

The development will overcrowd the area and I object to this. The development will make traffic and parking in the local area even more treacherous. As a competitive cyclist myself, I would mock the planning team’s idea that there would be an useful/positive increase in cycling. The majority of local routes are long, windy country lanes with very little cycling safety – plenty of blind spots and no cycle lanes, putting cyclists lives at risk. The increased traffic (estimated 4,000+ cars) from the new homes would make the cycle routes even more dangerous. The routes are hardly efficient for commuting!

I believe the development will take pollution to dangerous levels that could worsen the health of local residents. Air pollution in the development area already exceeds levels recommended by the EU and this should be taken seriously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5658  Respondent: 15569217 / Stephen Mahon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECTION TO GUILDFORD BOROUGH COUNCIL DRAFT LOCAL PLAN (JUNE 2016) AND TO THE INCLUSION IN THE PLAN OF SITE ALLOCATION A35 – THE FORMER WISLEY AIRFIELD – FOR A NEW SETTLEMENT WITH 2,000 DWELLINGS

I write to express my objection to the removal of the former Wisley Airfield from the Green Belt.
The area serves a vital role in preventing urban sprawl and development would create an urban corridor stretching from London to Guildford. There are no exceptional circumstances established to warrant removing the site from the Metropolitan Green Belt. There is ample brownfield land in urban areas which needs to be regenerated without the need to encroach on protected Green Belt land.

The local plan as drafted poses a threat to the historic rural settlements of Ockham, Hatchford and Downside.

The potential to create an additional 2,000 homes in close proximity would be disastrous for the general area and Cobham.

The traffic congestion would be horrendous and the infrastructure simply will not cope with such a large development. The shopping and rail facilities at Cobham are already saturated.

We are supposed to have a Green Agenda but this cannot be the case when developments of this type are under consideration. Not only would air quality be severely impaired but the area is a haven for wildlife with protected species on and near the site.

Objections are supported by the unanimous rejection of Application No 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of the Planning Officers.

On this basis, I cannot comprehend why the former Wisley Airfield should be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5672  Respondent: 15569601 / Simon Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
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   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIl) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I would like to object very strongly to the plans put forward for the Horsleys and most of all to the development of the former Wisley Air Field.

The infrastructure is totally inadequate for the number of units planned. The local schools and medical facilities are already overloaded and of course there would be added strain on Guildford Royal Surrey with extra houses in this area and all the other areas within the Guildford boundaries.

The roads are not of the necessary size or structure to take the additional traffic, at times they are unable to cope already especially around school start and finish times.

There are many brown sites that should be developed without intruding on the Green Belt. It cannot be right to double the size of this area which is totally unsuitable for this size of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY(SITE) A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5713  Respondent: 15571553 / Darren Carbine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site A35 - Three Farms Meadow site - I OBJECT

The continued inclusion in the plan of Policy A35 (land at Three Farms Meadow, the former Wisley airfield, Ockham). Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. Policy A35 should be removed immediately from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA)
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined
- Insufficient information about the impact on the local water table and run-off (see comments and attached pictures on flooding in Horsley above)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

***Attached documents:***

- [Flood.jpg](#) (61 KB)
- [Flood2.jpg](#) (101 KB)

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**Comment ID:** PSLPS16/5727  **Respondent:** 15571905 / Jane Cochran  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. 2100 homes on this site would present an unbearable strain on the existing infrastructure and completely alter the nature of the surrounding villages.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. I expect few of these homes will be truly affordable to local residents and will lead to a further influx from surrounding areas and out of London and thus not meet the requirements of the local population. Rather than the families of local residents being housed, there will even more crowding in the area.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham. 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Residents will need to visit nearby shopping centres and will almost all rely on private transport. At present cyclists are already endangered by the number and speed of cars passing through the area and this will do nothing to improve the situation.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads which are already congested. At present the roads are in a terrible state with numerous pot holes and the council seems to do little to maintain them.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. The situation would be impossible during the construction phase which could last for several years.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them). The increased congestion on the road is likely to make car drivers even more frustrated and even more of a risk to cyclists and pedestrians.
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. In addition the council seems to show no support for measures to reduce traffic on the roads such as the provision of school buses which were once in place but have now been terminated.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). In addition, such a large development will have a major impact on views from surrounding beauty spots.

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• Finally, I object to the loss of agricultural farmland in the area. Several farms within the Borough have already been subject to development. The continued erosion of the area’s rural heritage is a significant loss to borough.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5729  **Respondent:** 15572033 / Susan Wiera  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the draft Local Plan for the following key reasons:

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3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/5740</th>
<th>Respondent: 15572449 / Neil Titley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
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• The Council has allowed many existing houses, which would be ideal for first time buyers and those with families, to be turned into houses of multiple occupation, in order to house students, who make no contribution to Council Tax, and who are a wholly transient population. The University should be made to house their students in Halls of Residence within the purlieu of its own considerable land holdings, thereby releasing much needed housing stock.

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Comment ID: PSLPS16/7641  Respondent: 15572801 / Kathy Kirk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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: PSLPS16/5748   Respondent: 15572833 / Karl Penn   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My over-riding concern is that existing properties in areas such as ours are being told repeatedly by Council offices and SW Water that the threat of flooding is because of developments and the lack of / upgrading of infrastructure and drainage services to support those projects.

More specifically:

- The proposed removal of the Former Wisley Airfield from the Green Belt. The development proposal is creating infill of green belt areas and that has already been abused with the M25 services at Cobham. There are surely areas that require regeneration rather than developing new ones, or over populating areas such as Ockham and Ripley.
- We first moved to the Cobham area in 1987. The increase and impact of transport – both in terms of volume, and size – is staggering. Look at the weight of traffic which travels along Plough Lane – with cyclists! There is already sever congestion because the road systems are inadequate and an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
These are old villages and hamlets which supported by infrastructure never intended for modern day living. There can’t be development with improvement in infrastructure.

- I’m a dog walker – and there is a genuine risk to pedestrians, dog walkers, and cyclists from the increased traffic volume.
- There are environmental concerns which relate to the above, and as I understand, air pollution in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels – or perhaps Brexit means that can be ignored!? In addition, what about wildlife and the changes to / loss of natural habitat.

The application shouldn’t be considered without a full impact study, and a huge dose of common sense. This is not nimby’ism – these are genuine concerns about the area I live which is rapidly under threat.

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7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
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   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3774  Respondent: 15572993 / Laura Jamieson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe, putting my family and others in danger.
It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. RHS Wisley traffic already cause frequent congestion by traffic on local roads – there is already vulnerability and this will get worse.

1. The associated traffic increase from the RHS has not been taken into account.
2. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis – again, more danger and potential fatalities.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB and destroy the far reaching countryside views for future generations. Surely there is a responsibility to maintain this?

Object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees – Why bother to consult if you then ignore the overwhelming popular view?.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5755  Respondent: 15573025 / Robert Covill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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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.

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   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
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Yours faithfully

Charlie Jamieson

Bedford Gate Cottage, Elm Corner, Ockham GU23 6PX

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Other: This site is not deliverable within 5 years due to problems with sewerage and water capacity, outlined by Thames Water & the OCK DVOR air traffic control beacon which limits development until 2022

- No very special or exceptional circumstances exist - Alternative sites exist
- The proposal includes the site SCC safeguarded for waste under the Surrey Waste Plan
- The site is not listed for development under the existing 2003 Local Plan
- There is not enough land to provide a sustainable community based on GBC’s own parameters
- There is no update at all to the Heritage study despite the significant Bronze Age haul found in Ockham village in May 2013 and the likelihood of further remains on the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5800  Respondent: 15574721 / Emily-Anne Cheese  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to STRONGLY OBJECT to the continued inclusion of the former Wisley airfield now know as the Three Meadows as a strategic site in the local plan.

I object to to total disproportionate number of housing in this part of the borough it is a massive encroachment on the green belt. It is ridiculous for over 2000 houses to be built in a village that's train station is already at maximum capacity, as are the schools and doctors. The infrastructure required for such a massive influx of people would need an entirely new village. The country roads would prove extremely dangerous to have over 2000 cars on top of the already narrow and busy roads.

I object as it would totally ruin the beautiful and historic village of Ockham that has been lived in for generations of families.

To conclude I once again fully and wholeheartedly object to the inclusion of the former Wisley airfield now know as the Three Meadows as a strategic site in the local plan.

Take it out. Save this beautiful village for future generations in this already rapidly decreasing green land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3794  Respondent: 15574721 / Emily-Anne Cheese  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object very strongly to the inclusion of Three Farms Meadows in the draft local plan for so many reasons.

I object to the fact the council has still not removed this site from the local plan, despite receiving thousands of objections from the local residents. This is a waste of tax payers money as it has been ignored by the council.

It's further from railway stations the any other identified strategic site. Which are at full capacity anyway.

It's close to junction 10 of the M25, which is one of the most congested junction in the country, this would cause further congestion in an already congested area.

There are narrow country lanes surrounding the area, which allow no pavements or lighting for people to travel at night, it's unrealistic and unsafe to assume people will travel this way.

I consider for the reasons listed above and multiple other reasons that this plan should not be put forward. Unlike previous objections, I hope you take this seriously and listen to the local residents, this is where we live and it means a great deal to us. Hence why we have objected so many times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/5801</th>
<th>Respondent:</th>
<th>15574785 / Jennifer Wright</th>
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Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings.

I am writing to object to the removal of the former Wisley Airfield from the Green Belt, and the proposed increase in housing in our surrounding area.

I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. And no exceptional reasons have been given for this to happen. With so many brownfield sites in urban areas to be regenerated this is an outrageous grab to take away our precious and prized Green Belt that can be enjoy by all now and HOPEFULLY in the future for our children. That’s if Guildford Council do not chip away at it.

I also object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham. This will have a huge knock on effect to our circumstances in historic Downside Cobham where I live, in regards to the traffic, noise, oversubscribed school places, the struggle to get a GP appointment, and the already extremely over packed commuter trains from Effingham Junction as well as the constantly full station parking. There are no footpaths, cycle paths and very fast traffic along the lanes in the area approaching Effingham station so you have to commute by car to the station. Alternative stations such as Cobham and Stoke D’Abernon, Weybridge, or Esher are also at capacity, if not more so. It is already a battle to get to work, please don’t make it even harder for us.

In Downside we already suffer with the noise and pollution of the M25 and service station, the development of more housing will add to this problem with all of the building site traffic on our narrow roads, and the pollution this will cause. The infrastructure to support such an increase in housing is blatantly NOT in place and there is absolutely no plan to invest in such infrastructure before or after such an increase in population. Guildford Council will be a disgrace to
approve these increases and the removal of the Green Belt, damaging our way of life, and the natural wildlife we are surrounded by.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/5842  **Respondent:** 15575553 / Sam Bishop  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )**

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Attached documents:**

**Comment ID:** PSLPS16/5861  **Respondent:** 15575905 / Jennie Barker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**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: PSLPS16/5884  Respondent: 15576961 / Jacqueline Edney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I also object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham. This will have a huge effect to our circumstances in Downside, where I live and Cobham. Cobham is the nearest shopping centre to the proposed development and the increase in traffic on the narrow country roads is not acceptable. 2,000 new houses means in my estimation around 4,000 cars (especially as the development is not serviced by mass transit services). These extra vehicles will result in increased traffic jams, weight of traffic at peak times, noise and pollution. In Downside we already suffer with the noise and pollution from the M25 and the MSA, the development of more housing will add to this problem with all of the building site traffic during the construction phase.

I also think it's a tragic shame that the plan calls for the immolation of historic Ockham. This lovely hamlet is set to be subsumed into the developed area with high rise urban style buildings!

The Green Belt was intended and implemented to stop London sprawling. Stop trying to punch holes in it and forever ruining the character of not only Surrey but the whole of the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There are plans again for Wisley – less than 2 miles from us to have a development of 2000 houses – which would also have an enormous negative impact on transport and other infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5908  Respondent: 15578337 / Marie Pay  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to voice my objection to the I plan from the green belt.

There are ample brownfield sites available. We do not want urban sprawl.

Not least the harmful impact on the strategic road network the A3 and M25 on an already overcrowded road with many accidents.

Plus the air pollution would be worst at an area which exceeds EU permitted limits.

There is NO suitable public transport and local stations are already overloaded. They are citing Cobham as the nearest station which is a complete joke.

The Planning officers have agreed on the identified concerns

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5935  Respondent: 15578977 / Norman Evans  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The former Wisley airfield is entirely unsuitable for use as a new ‘town’. The site was requisitioned by the Government for wartime purposes with a promise that it would be returned to agricultural use in due course - that promise should now be honoured. The land is Metropolitan Green Belt land except for about 15% consisting of the old concrete runway and apron.

A planning application for temporary use of the site for filming was rejected in 2014 and later refused on appeal, the Inspector stating that the development would be detrimental to the Green Belt and would likely cause harm to local environmentally sensitive sites. A much more substantial planning application for a small town of some 2,100 homes, medical centre, schools and supermarket was last year submitted by the owner, Wisley Property Investments, but was recommended for refusal by the Council officers and then rejected unanimously by a special meeting of the Planning Committee, who totally agreed with the 14 main reasons for refusal by the officers. I will not list all the reasons here because the Inspector will have access to the Council’s files, but my objections include:
- loss of Green Belt
- loss of good quality agricultural land
- danger to nearby environmentally protected sites
- totally unacceptable traffic problems, including dangerously high pollution
- no infrastructure and no transport links (except A3)
- overdevelopment and unacceptable housing density
- five-storey buildings, totally out of keeping with the Surrey countryside
- detrimental impact on Surrey skyline and increase in light pollution.

I will emphasise the traffic problems this development would cause. Some 4,000 cars would be added to the area’s roads, causing more congestion on the A3 into Guildford and at the junction with the M25 (J10), where pollution levels often exceed permitted levels already and are too high to allow schools to be built on the site. The proposed new A3 junction at Wisley would have to accommodate a large increase in traffic from all directions, while Ripley and East Horsley would be seriously affected.

The fact that the scheme involves local road closures and one-way streets is a clear demonstration of how impractical the scheme is. The Council’s comprehensive rejection of this scheme renders any large-scale development of the site out of consideration: it is not practical, viable or sustainable. Indeed, the Council’s Leader and Lead Councillor for Planning said the scheme failed the Council’s sustainability test ‘dismally’. Why, then, has the Council not removed the site from the Local Plan which would be logical in light of its fundamental unsuitability? I merely point out that Wisley Property Investments has links to the Conservative Party, including its ‘front man’ who happens to be the lead councillor for planning for the Conservative-controlled Vale of the White Horse District Council in Oxfordshire.

The site should continue to be used for agricultural purposes, while the runway and apron could be used for a solar farm or for hydroponic horticulture (no need to remove the eight-foot deep concrete at great expense

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5940  **Respondent:** 15579105 / Lucy du Preez  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I object to building on Wisley Airfield.**

This plan has been poorly thought out - the proposal to build over 2000 houses on this site, adjacent to the tiny village of Ockham, will cause immeasurable damage to the surrounding area. It would totally change the character of the area, and have an enormous negative impact on residents of all the local villages. RHS Wisley and the Thames Basin Heath Special Protection Area are adjacent to this site - these are extremely important nationally in terms of promoting and protecting wildlife; the construction of a new town nearly on top of these areas would be extremely damaging.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I am writing about the plans for a housing development on a greenbelt site. The government is always saying that brownfield sites will be used, and yet there seems to be an ever increasing number of developments.

The objections are the following:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to Guildford Borough Council draft Local Plan (June 2016)

and to the inclusion in the Plan of the development at the former Wisley Airfield site.

I wish to object to the inclusion in the draft Local Plan of the development of 2,000 dwellings at the former Wisley Airfield site.

It seems bizarre to see the site included in the draft Plan since it was only in April that the Council itself turned down an application for a development which in essence was similar to that in the Plan. Presumably therefore the Council then accepted most if not all of the objections to the application: these apply equally to the development outlined in the draft Plan.

I shall list here only those issues which would impact in particular on Cobham. Those who live in the Borough of Guildford will doubtless have many other concerns in addition.

First, the Wisley Airfield is in the Green Belt. It is an essential part of the purpose of the Green Belt to prevent continuous urban sprawl. If this site were to be developed, there would be pretty well continuous development between London and Guildford. The Council should look instead for the development of brown field land which needs regeneration.

Second, the transport infrastructure in the area is already under very considerable strain and cannot take more. The Wisley Airfield development would be likely to bring into the area an additional 4,000 cars plus all the HGVs, vans, and so on required for servicing the households in the area.

It is true that over the next few years Junction 10 of the M25 is to be remodelled, but this is to cope with the present traffic and any likely expansion which can already be foreseen, not yet further additions. In any event, that would not help with other current tailback issues such as at the junction of the A3 at Painshill with the A245 and at the junction at Esher/Oxshott with the A244.

There would also be additional strain on the narrow local roads. There is very little public transport and the large majority of residents would have to use their cars.

Third, air pollution. Parts of Cobham already have high levels of air pollution. It would be likely that Cobham would be used by the residents of the Wisley development as its nearest shopping centre and this would add yet further to the pollution.

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>PSLPS16/8331</th>
<th>Respondent:</th>
<th>15579457 / RSPB South East Office (Heather Richards)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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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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<td>Appendix 1</td>
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<td>To which section of the plan (paragraph/policy/map/table) does this comment relate?</td>
<td>Policy A35: Land at former Wisley airfield, Ockham</td>
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<td>Do you consider this section of the plan is legally compliant?</td>
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Do you consider this section of the plan is sound? No

Do you consider this section of the document complies with the Duty to cooperate?

RSPB Comment:

For ease of reference we deal with all of our concerns with the proposed allocation of the former Wisley airfield (A35) for development here, including the relevant provisions within the Habitats Regulations Assessment of the Submission Plan.

The RSPB considers that there are inherent inconsistencies between the stated aims of the Plan and the inclusion of the former Wisley airfield which are central to the overall soundness of the Plan. The Foreword to the Plan states that:

“It also outlines how we will conserve and enhance the unique qualities of our natural and built environment, especially in the Surrey Hills Area of Outstanding Natural Beauty and Thames Basin Heaths Special Protection Area. This Development Plan Document sets out how we propose to meet these conflicting demands” (p5).

The Foreword continues:

“Whilst we will conserve and enhance our special landscapes, the Local Plan aims to balance protecting the borough’s unique environment with meeting our social and economic needs.”

The RSPB submits that this statement gives a clear expectation that protection will be accorded a higher priority than development in circumstances where there are conflicts between the need to provide housing and the need to protect nature conservation interests. A key factor is that existing protected areas must be conserved in situ, whereas there is greater flexibility to decide where future housing allocations will go.

The RSPB notes Strategic Objective 6 of the Plan: “To protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty for their biodiversity and landscape characteristics.” In addition we note Strategic Objective 7: “To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates and is adapted for, climate change.” All of Strategic Objective 6, and the first part of Strategic Objective 7, are pertinent to the proposed allocation of the former Wisley airfield. The RSPB consider that the inclusion of the former Wisley airfield represents a clear failure by the Council to meet its requirement to conserve its internationally designated areas and has placed development demands first, and is a failure to meet the strategic objectives it has set itself. These clear internal inconsistencies demonstrate that the Plan is not the most appropriate when considered against reasonable alternatives and that the Plan consequently fails the “justified” test of Soundness.

The RSPB notes that policy S1, Presumption in favour of sustainable development, states:

“We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental considerations in the area.”

However, this does not mean that it will be possible to find appropriate solutions to allow the development to go ahead.

Policy H1, Homes for all, makes it clear that “Sites should not significantly impact on the visual amenity and local character of the area or adversely affect an environmentally sensitive location.” We contend that this policy presumption should be applied throughout the plan, with a key bearing on the evaluation of sites that are proposed for inclusion as allocations within the Plan.

We note that the supporting Policy P2, Green Belt, states that “If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.” (para 4.3.14). However, a visit to the former Wisley airfield clearly indicates that, aside from a runway and adjoining apron that the site is clearly open in character, a fact borne out that the first reason given by the Planning Officer’s report into the Wisley application recommended refusal for the “clear and substantial detrimental impact on the openness of the Green Belt” (Officers’ Report, para 2.1).
We note the following statement in Topic Paper “Green Belt and the Countryside”:

“Given the significant constraints that exist to the north and south of the borough (Thames Basin Heaths Special Protection Area and Surrey Hills Area of Outstanding Natural Beauty), we are left with a ribbon across the central part of the borough that remains potentially suitable for development.” (para 4.66)

On the basis of this statement from the Council, the RSPB questions why the decision has been made to ignore the constraints highlighted here and to propose removing the former Wisley airfield from the Green Belt for the provision of housing, particularly given its proximity to the Thames Basin Heaths Special Protection Area.

Later on, the Topic Paper states:

“Part of the extended Green Belt land is proposed to be designated as Suitable Alternative Natural Greenspace (SANG) which will be retained as open space in perpetuity. This is consistent with the objectives of the NPPF to enhance the beneficial use of the Green Belt.” (para 4.94)

We contend that there are clear tensions between this statement and the provisions set out within the Plan to release existing green belt land for delivery for a major development and SANG, which appears to be developing green belt land for housing at the Wisley airfield site, with attendant risks to the Thames Basin Heaths Special Protection Area, whilst at the same time proposing to turn land into SANG and add it to the green belt. This adds further support to our contention that the Plan is not the most appropriate when considered against reasonable alternatives and that it therefore fails the “justified” test of Soundness.

We also note that that the plan explains that it is unable to accommodate all of the new development, leading to the release of land at other sites, including Wisley (para 4.1.8). This clearly indicates that this proposed location is not sustainable, a point that we have raised previously in our objections to the recent planning applications.

**The RSPB’s concerns with the site**

We highlight here the key concerns which we raised on the recently rejected planning application for the former Wisley airfield, that we consider are central to the inclusion of the site as an allocation in the Local Plan. We focus on concerns we raised about the general suitability of the site, as we consider that these are so fundamental to the site that they cannot be resolved by the promotion of an alternative development scheme on the site.

The RSPB highlighted that

“the location of the SANG between the development and the SPA will actually draw people towards the SPA and would end up simply providing new residents with a route to the SPA. Clearly, this defeats the object of providing a SANG.” (RSPB objection letter, 25 March 2015)

We further stated:

“Whilst we understand the developer’s desire to locate the SANG in the 400m zone as built development is highly unlikely to be permitted we consider that the constraints this has on its design is likely to introduce pinch-points and compromise the SANG’s effectiveness.” (RSPB objection letter, 25 March 2015)

Finally the RSPB stated:

“The RSPB’s view is that the existing PROW [Public Rights of Way] fundamentally and unavoidably compromise the functionality of the SANG as an avoidance measure.” (RSPB objection letter, 12 February 2016)

It is important to note that as a result of the multiple rights of way run right across the whole development site and into the SPA, providing ready access to the SPA to residents of any housing scheme that is constructed on this site, it is our view that no housing allocation is appropriate in this location.

**The Habitats Regulations Assessment**
It is important to note the caveats associated with the evaluation of this particular allocation that the HRA uses to make its inclusion in the Plan appear acceptable. It states that bespoke SANGs “if provided to an appropriate standard and in a timely manner will provide a suitable avoidance measure” (p39). There are two key issues here: firstly whether, as highlighted above, it will be possible to provide a SANG of an appropriate standard, given the physical constraints of the site (long and narrow), and the presence of the multiple public rights of way. Secondly, it will be essential that this bespoke SANG is ready for the first residents to move in and that the ongoing development does not affect the tranquillity of the scheme. The designs promoted for the recently refused planning application do not offer confidence on either front. We disagree with the conclusion of the Plan HRA that it will be possible for the Council and Natural England to be content with the SANG provided on site (p39), for the reasons we highlighted in our section above considering our concerns with the site.

The HRA acknowledges that part of the site is located within the 400m zone of the Thames Basin Heaths Special Protection Area and that it would be this part of the site which would provide the SANG for the development and notes that a subsequent application level assessment will be required (para 7.3.9). The RSPB respectfully disagrees with the assertion of the HRA authors that

“It is not the purpose of this HRA to determine the deliverability and suitability of the SANG identified above in line with Natural England’s SANG Criteria, merely to determine if the identified SANG provides suitable capacity to support the quantum and location of housing planned within the Plan.” (para 9.3.5)

As set out above in relation to our concerns about the recently rejected scheme, we do not consider it likely that a project level assessment will be able to adequately exclude the risk of harm to the Special Protection Area, as we do not believe a SANG at this development site can be effective in drawing residents away from the SPA as a result of the Public rights of way network on the site. As this information is already known and was available to the authors of the HRA we consider it inappropriate to rely upon such an approach here – the issues of concern are ones which are not capable of being resolved at the application level. Part of the role of the HRA of the Plan should be to evaluate the likelihood that a project-level assessment can be passed – helping to give a clear understanding of the likely deliverability of key sites: the former Wisley airfield is expected to deliver 14.4% of the Borough’s overall housing until 2033 – so it is essential that any risks to such a site coming forward should be clearly evaluated.

What changes do you suggest should be made to the document?

Policy A35, and associated references to it should be deleted.

If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination? Yes

Why do you wish to participate at the Examination?

The issues surrounding this proposed allocation are of sufficient complexity that it is necessary to be able to address comments provided by other parties and engage in discussions at the Examination hearings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed development of further large scale housing, retail, commercial, traveller and schools on the former Wisley Airfield site is ill judged and wholly inappropriate. The impact of a sudden addition and development of over 2000 properties on the Wisley Airfield site would be enormous on the surrounding villages, which have gradually developed in a sustainable manner over a very long period of time. This is now under threat and such development proposals will ruin and change the nature of our community beyond repair forever. I am opposed to these development proposals in any shape for form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6019  
Respondent: 15582145 / Robert C Jones  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am sure you (councillors, developers and investors) are all aware of the many, many objections to this plan.

My objection is simple, the drainage for rain water run off from this proposed elevated developed site has not been thought through.

To me it is plainly obvious that if there is any weather 'event' resulting in above normal rainfall (even normal rainfall often causes problems) the adjacent Wisley Lake (or Bolder Mere) will flood resulting in a flooded A3 and probably the M25 not to mention the nearby River Wey and Mole Valley which already floods regularly.

Any increase in concrete in this sensitive area will have dire consequences for all surrounding districts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7378  
Respondent: 15582337 / Peter Hill  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to site A35 Wisley Airfield. Yet another massive 2000 home development that is inappropriate and unsustainable and again in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6024  
Respondent: 15582401 / Peter Mathers  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
As residents of Ripley, my family and I have studied with interest the Local Plan and the wealth of carefully argued objections that you have received. We cannot offer any points that have not already been covered; but would endorse the comments that have been made and would underline, once again, the strength of feeling amongst the local community against what is being proposed. We note in particular the lack of logic in retaining the proposed Wisley Airfield development in the Plan, in spite of the fact that Officers and Councillors comprehensively rejected that proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to The Former Wisley Airfield being included in the Draft Local Plan, leaving nearby to this site and seeing on a daily basis the already serious traffic issues around the M25/A3 junction I am shocked that the Councillors wish to see it increase. To include this site is crazy it is unsustainable! The local plan is all about sustainability so I am shocked that Councillors are allowing this site to be included. Please see sense and remove The Former Wisley Airfield from the Draft Local Plan. I also object to the erosion of the Green Belt, once it is gone, we will never be able to get it back, please make sure the Guildford Councillors are not responsible for such a serious mistake.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Proposal to remove the Horsleys from the Green Belt, the Proposal to extend the boundaries of the settlement areas of the Horsleys and the Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham

I am writing in connection with the proposal to remove the Horsleys from the Green Belt, the proposal to extend the boundaries of the settlement areas of the Horsleys as well as the proposal to develop over 2000 homes at what was once the Wisley Airfield in Ockham to all of which I object for the following reasons:

1. **The proposed changes represent a fundamental breach of Metropolitan Green Belt rules:** The GBC’s Planning Officer said in relation to a previous planning application in relation to the Wisley Airfield site in
rejecting the application said "It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified".

It is clearly stated in Ministerial Guidance that **unfulfilled housing need does not qualify as very special circumstances** and therefore the removal of this site from the Green Belt is entirely unjustifiable in relation to the Metropolitan Green Belt rules.

1. **The proposed site at Wisley Airfield does not meet acceptable levels of Sustainability**

In its Sustainability Appraisal of the Guildford Borough Local Plan issued in June 2016 AECOM rated this site as the worst of the six sites in terms of sustainability with 8 out of the 21 criteria graded as Red (poor sustainability).

Amongst the factors that influenced this grading are the following: no public transport currently servicing the area, the nearest train stations are more than 3 miles away, there is insufficient parking at both local stations to accommodate additional commuters, there are no schools or medical services, new roads will be needed as travel from the proposed site will depend on motor vehicles etc.

In essence this is a proposal to create a large scale green field settlement in a poorly sited green field location.

1. **The site will have a severe impact on local traffic and infrastructure:**

The roads around East Horsley are to say the least poor with many being little more than winding lanes without pavements and the main through roads Forest Road and Ockham Road South and North pass through residential areas that are in many places narrow and unlit. Any increase in the local population will only put added pressure to the volume of traffic going through the village centre and in and around Horsley Station and Effingham Junction Station which will add to the congestion at peak hours. The likely further traffic congestion at the A3 / M25 intersection will only exacerbate the existing problems.

Other facilities in the Horsleys such as schools and the East Horsley Medical centre will not be able to cope with the additional population planned as a result of the Wisley Airfield and proposals for housing in the Horsleys.

4. **The development is totally out of keeping with the local character, context and distinctiveness:**

East Horsley with 1,760 homes is currently the largest settlement borough outside Guildford itself with a housing density of 8.1 dph within its settlement area. The proposal at Wisley Airfield is to build 2,100 homes, which is 19% more housing than in East Horsley at a density of 6 times as much (49.1dph) which is similar to that utilised in a metropolitan area. This sort of development is completely out of character for an area of rural Surrey and the character of the whole area would be irreparably damaged if the Wisley Airfield development goes ahead.

5. **New homes in the Horsleys:**

The plans indicate a further 173 homes in East Horsley and 420 in West Horsley, a total of

1. **This results in an approximate increase of households of 10% in East Horsley and 35% in West Horsley. This will substantially increase the volume of traffic in the village not least when added to the likely number of motor vehicles if the proposed Wisley Airfield development also takes place. It will also put a strain on the village facilities such as schools, the medical centre and the stations all of which are at capacity now.**

In summary it appears to me that the proposals for new homes in the Horsleys and at Wisley Airfield have been poorly thought out with little regard for the Metropolitan Green Belt rules. There has been a complete failure to consider the impact on the infrastructure and environment across a widespread area, the strain on local facilities and the fact that the proposed developments are totally out of character for the rural area of this part of Surrey.
I would therefore urge Guildford Borough Council not to countenance any development at the Wisley Airfield site and to considerably reduce the planned housing increase in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6068  Respondent: 15583329 / Robert Morgan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) in particular to the obscene scale of development in the Horsleys and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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. It’s frankly a disgrace that it continues to be considered when it’s categorically not a suitable site for a new town.
- I object to the detrimental impact the proposed town at Wisley will have on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a
proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- With regards to the Horsleys specifically I am very concerned about the following:
  1. The in setting of the East Horsley settlement area from the Green Belt and the associated implications for development
  2. The scale of proposed development in West Horsley (35% increase) is totally absurd and will ruin the area for good. I see no proposed infrastructure improvements to cope with such a large number of new houses

This area of the Borough is attractive to residents because of its characteristics – a feeling of spaciousness, access to the countryside and infrastructure utilisation that makes for a high standard of life. The proposed development will unquestionably immeasurably worsen the lives of the existing residents because of the vast scale proposed. Limited development that is of an order of magnitude that befits the areas where it is proposed must be the only acceptable solution.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2342  Respondent: 15583329 / Robert Morgan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to register my profound dissatisfaction with the amended local plan 2017. I live in Horsley and I am appalled at the scale of development the plan presents. It amounts to a zero sum game where more people will be using the same infrastructure meaning a worse quality of life for existing residents. Overall I would make the below comments:

- Including the proposed development at Three Farms Meadow, Horsley and the surrounds are shouldering far too high a proportion of the Plan’s housing proposals. Large scale housing should be built on brownfield and be placed around infrastructure that can support it.
- I am especially concerned about removing Horsley from the green belt meaning the villagers will be living under constant threat of development in places like the wonderful Horsley Tennis club or Kingston Meadows.
- On the ludicrous proposals for the new town at Three Farms Meadows I have the below comments:
  - It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
  - It is further from railway stations than any other identified strategic site making it both unsustainable and a community reliant on cars thereby worsening the already appalling traffic.
  - It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
- Local roads are at capacity.
- Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
- There is insufficient employment available onsite so that almost all residents will have to travel to work.
- It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
- I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
- I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
- I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
- I object to the removal of additional 3.1 ha from the green belt without any justification.
- I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
- I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
- I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
- I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
- I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
- I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
- I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
- I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
- I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
- I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
- I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
- I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
- I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
Based on the above I consider the plan not fit for purpose. We are privileged to live in a sought after and beautiful part of the country. It’s incumbent upon us to preserve its character, open space and heritage. This plan equates to a decimation based on spurious housing numbers which, if enacted, would tarnish this area forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6070  **Respondent:** 15583393 / Jane Buckingham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **Proposed Submission Local Plan: Strategy and Sites 2016 – Part 2 Sites**

Objections are related to particularly high volume inappropriate developments in the green belt and lack of exceptional circumstances.

- **A35 LAND AT FORMER WISLEY AIRFIELD (Objection)**
  - 2000 homes? Too large, unsustainable, and the developers’ marketing desire to brand this “brownfield” development is simply untrue, as anyone aware of the history of the site is aware.
  - This is disproportionate green belt development with no supporting infrastructure whatsoever. The M25 and A3 and local roads simply cannot cope with this high increase in car journeys, they are often gridlocked today, and public transport in the area barely exists. The suggestion of securing a bus service “in perpetuity” is highly misleading by the draft plan authors, will Guildford be purchasing their own bus franchise and setting eternal terms and conditions and bus routes? We think not. Such a feat “in perpetuity” is impossible, and in fact Effingham barely has a bus service today. The roads and facilities in adjoining villages will suffer significantly through this lack of infrastructure and misleading positioning by the authors.
  - Guildford’s own planning committee refused this development recently and we are mystified as to why this is included. It suggests something here does not ring true and requires closer scrutiny.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6074  **Respondent:** 15583649 / Sheila Attridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT also to Policy A35 (Wisley Airfield):

- This should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- There is the question of the irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• No Green Belt “exceptional circumstances” are presented.
• This is not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site is ignored.
• Loss of farming land.
• The site is too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Development will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• There would be an unacceptable increase in air pollution.
• No existing public transport, and stations are miles away.
• No proper traffic data exist.
• Housing density would be far too great.
• Over 2,000 houses would swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access is confined to inadequate narrow lanes.
• The water table and surface water flooding are not considered either for site itself or for downstream areas on River Mole.
• There would result a major impact on neighbouring villages, especially the Horsleys (see above).
• No assessment has been made of the collective impact on area of this and 6 Horsley sites (see above).

It is my belief that this policy would be catastrophic for the character of the area and the well being of existing residents. I OBJECT in the strongest possible terms

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6085  **Respondent:** 15583745 / Jane Friend  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
7. Whilst I live in Elmbridge I consider that this proposal will severely impact Cobham and Stoke D'Abernon as well. Its inconceivable that Cobham will not suffer substantially increased traffic, to the railway station in particular which is bound to share some of the load with the designated stations.
8. I also regularly enjoy the tranquil environment of the public footpaths across this local area and shudder to contemplate the impact of the equivalent of a new town being squeezed onto this site.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/379  Respondent: 15583777 / Adam Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy A35 (former Wisley Airfield) due to the increase to 95.9 hectares. The volume of traffic and pollution levels around this site would be totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6090  Respondent: 15583841 / Catherine Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposed Submission Local Plan: Policy A35, land at former Wisley Airfield, Ockham. I OBJECT to the inclusion of this site as I believe it is a fundamental breach of the Metropolitan Green Belt Rules.

Earlier this year this site was refused planning permission on over 14 counts – why on earth is it back in?

The proposed development represents a fundamental breach of Metropolitan Green Belt rules: The site forms part of the Metropolitan Green Belt. Under the NPPF, development on such Green Belt land is only permitted under ‘very special circumstances’. GBC’s Planning Officer, in assessing a previous planning application from the developer of this site, rejected their application, arguing that: “It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified”.

Ministerial guidance has repeatedly confirmed that unfulfilled housing need does not qualify as a very special circumstance. Whilst the developers’ previous planning application was judged and rejected based upon the 2003 GBC Local Plan, the proposal to include this site within the 2016 Proposed Submission Local Plan does not fundamentally change the argument against it. Any removal of this site from the Green Belt can only be made based upon ‘exceptional circumstances’, which cannot be justified on the basis of unfulfilled housing need. If this was the case, then the entire Metropolitan Green Belt would already have become filled with housing. Removal of this site from the Green Belt is totally against its rules, regulations and underlying spirit. The site location at the edge of the M25 circle represents a ‘first line of defence’ against metropolitan encroachment into the Surrey countryside. If this site is developed then it becomes only a question of time before Guildford itself is absorbed into the sprawling London conurbation.

I trust that you will take my views into account, and I would appreciate acknowledgement of receipt of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3450  Respondent: 15583841 / Catherine Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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 Policy A35 Three Farms Meadows because it is the least sustainable strategic site identified in this draft Local Plan - further from railway stations, adjacent to the most congested stretch of the A3, and the most congested Motorway Junction on the M25 (J10), and local roads will not be able to cope with the projected volume of additional traffic that will result. There will such a considerable impact on local facilities such as the Medical Centre in East Horsley, local schools and other amenities that those who live here already will have to look further afield, putting additional pressure on surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6094  Respondent: 15583969 / Tim Key  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I believe that the proposal to develop over 2,000 new houses at Ockham - and also the proposed development on Ockham Road North - will not only significantly damage the local infrastructure, which is already stretched, but also have a serious and long lasting negative environmental impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7050  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to site A35 Wisley Airfield - 2000 homes that are inappropriate in the Green Belt, and unsustainable re facilities and traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6137  Respondent: 15584929 / Ann-Marie Le Souchu  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6141  Respondent: 15584993 / Jan Lofthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECTION TO DRAFT LOCAL PLAN

I object to the G B C Draft Local Plan as follows:-

The inclusion of Green Belt Land for proposed development as strategic sites, particularly Three Farm Meadows Wisley, the Former Wisley Airfield because fo the following

NO EXCEPTIONAL CIRCUMSTANCES FOR BUILDING ON THE GREEN BELT
FORMER WISLEY AIRFIELD NOW T F M

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6161  Respondent: 15585313 / Kim Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO – Wisley Airfield A35 in appropriate development in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7099  Respondent: 15585313 / Kim Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO – Wisley Airfield A35 inappropriate development 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: PSLPS16/6171  Respondent: 15585345 / Wanita Styles  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO – A35 WISLEY AIRFIELD – THE DEVELOPMENT OF 2000 HOUSES IN THE GREENBELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6177  Respondent: 15585409 / Vanessa Styles  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO – Wisley Airfield A35 inappropriate development 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: PSLPS16/6179  Respondent: 15585473 / Peter R Dawson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I represent the owners of an international horticultural business in Cobham which owns land in Cobham and Ockham. Our Ockham site is very important for the development of the business and there are regular movements between the two sites of Tractors and cultivation and/or harvesting equipment. We also have vehicle movements between the two sites moving commercial stock.

We object very strongly to the re-inclusion of the Former Wisley Airfield/ Three Farms Meadows site into the Borough Local Plan after it was rejected as a suitable site for housing by the full planning committee and the planning department of the Borough.
We object to the plan’s proposal to remove the Wisley airfield / Three Farms Meadows from the green belt and we also strongly object to the similar proposals to build on green field sites in the Parish’s of East and West Horsley, Send and Ripley, and to the removal of these parish’s or parts of them from the Green Belt.

We object to the loss of the Agricultural land at The Farms Meadows through the proposed development there. Good agricultural land is a declining resource.

We object to the proposed development of the various sites in the parish’s of East and West Horsley, Ockham, Ripley and Send because they cannot happen without a big investment in services and this major requirement is hardly mentioned. Already the district is struggling with overflowing sewerage, with shortages of other utilities of Gas, water and electricity supplies. There is already a desperate shortage of school places for all age groups in this area of Surrey; Medical services are also fully stretched and inadequate for more clients. The Hospital will need to expand too.

We object to the proposals to increase the number of houses in this area by such a large amount on an annual basis. The road infrastructure is inadequate. The roads were developed in the days of the horse and cart, are narrow and cannot be widened easily because they are bounded by hedges. There are few footpaths and no cycle lanes or lighting. The mix of pedestrians, cyclists and ridden horses with fast cars and trucks are a recipe for disaster and litigation if no planning consideration was made. Due to the high traffic movements and the high number of goods vehicles using these lanes they are now breaking up. The area has some of the worst roads in the county.

We object to the proposed development of the Former Wisley Airfield on health grounds in that the site is very close to the major trunk roads of M25 and A3 and junction 10 of the M25. I have personally experienced discomfort due to the air pollution engendered by the traffic when walking on Ockham Common which is very close to the site when the wind is from the North round to the South East.

I object strongly to the development because of its likely affect on the Wisley and Ockham commons, part of the Thames Basin Heath Special Protection Areas, particularly considering atmospheric pollution, increased footfall and dog exercising on these fragile environments.

We object to the cavalier attitude of the planning department, the planning committee and their subcontractors in devising a housing need without consideration and planning for the infrastructure needed to establish their proposals. If it were a business making such poor plans they would quickly lose their money and become bankrupt. We object as taxpayers that we would have to bear the financial consequences of the planning incompetence’s

We strongly object to the proposals because of the effect on the picturesque villages which have a high number of old and historic houses, many listed. The proper development of The Borough should be to increase the number of high rise buildings in the centre, now that Guildford is a city, with schemes such as the station development, lesser rise building should be encouraged in the suburbs of Guildford.

We object to the lack of planning for work and employment for the residents of these developments. They cannot all take the train to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Proposal to remove the Horsleys from the Green Belt, the Proposal to extend the boundaries of the settlement areas of the Horsleys and the Proposed Submission Local Plan: Policy A3J, land at former Wisley Airfield, Ockham

I am writing in connection with the proposal to remove the Horsleys from the Green Belt, the proposal to extend the boundaries of the settlement areas of the Horsleys as well as the proposal to develop over 2000 homes at what was once the Wisley Airfield in Ockham to all of which I object for the following reasons:

1. The proposed changes represent a fundamental breach of Metropolitan Green Belt rules: The GBC's Planning Officer said in relation to a previous planning application in relation to the Wisley Airfield site in rejecting the application said "It has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified".

It is clearly stated in Ministerial Guidance that unfulfilled housing need does not qualify as very special circumstances and therefore the removal of this site from the Green Belt is entirely unjustifiable in relation to the Metropolitan Green Belt rules.

2. The proposed site at Wisley Airfield does not meet acceptable levels of Sustainability

In its Sustainability Appraisal of the Guildford Borough Local Plan issued in June 2016 AECOM rated this site as the worst of the six sites in terms of sustainability with 8 out of the 21 criteria graded as Red (poor sustainability).

Amongst the factors that influenced this grading are the following: no public transport currently servicing the area, the nearest train stations are more than 3 miles away, there is insufficient parking at both local stations to accommodate additional commuters, there are no schools or medical services, new roads will be needed as travel from the proposed site will depend on motor vehicles etc.

In essence this is a proposal to create a large scale green field settlement in a poorly sited green field location.

3. The site will have a severe impact on local traffic and infrastructure:
The roads around East Horsley are to say the least poor with many being little more than winding lanes without pavements and the main through roads Forest Road and Ockham Road South and North pass through residential areas that are in many places narrow and unlit. Any increase in the local population will only put added pressure to the volume of traffic going through the village centre and in and around Horsley Station and Effingham Junction Station which will add to the congestion at peak hours. The likely further traffic congestion at the A3 / M25 intersection will only exacerbate the existing problems.

Other facilities in the Horsleys such as schools and the East Horsley Medical centre will not be able to cope with the additional population planned as a result of the Wisley Airfield and proposals for housing in the Horsleys.

4. The development is totally out of keeping with the local character, context and distinctiveness:

East Horsley with 1,760 homes is currently the largest settlement borough outside Guildford itself with a housing density of 8.1dph within its settlement area. The proposal at Wisley Airfield is to build 2,100 homes, which is 19% more housing than in East Horsley at a density of 6 times as much (49.1dph) which is similar to that utilised in a metropolitan area. This sort of development is completely out of character for an area of rural Surrey and the character of the whole area would be irreparably damaged if the Wisley Airfield development goes ahead.

5. New homes in the Horsleys:

The plans indicate a further 173 homes in East Horsley and 420 in West Horsley, a total of 593. This results in an approximate increase of households of 10% in East Horsley and 35% in West Horsley. This will substantially increase the volume of traffic in the village not least when added to the likely number of motor vehicles if the proposed Wisley Airfield development also takes place. It will also put a strain on the village facilities such as schools, the medical centre and the stations all of which are at capacity now.

In summary it appears to me that the proposals for new homes in the Horsleys and at Wisley Airfield have been poorly thought out with little regard for the Metropolitan Green Belt rules. There has been a complete failure to consider the impact on the infrastructure and environment across a widespread area, the strain on local facilities and the fact that the proposed developments are totally out of character for the rural area of this part of Surrey.

I would therefore urge Guildford Borough Council not to countenance any development at the Wisley Airfield site and to considerably reduce the planned housing increase in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6272</th>
<th>Respondent: 15587681 / Elisabeth Hauck</th>
<th>Agent:</th>
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I object most strongly to Guildford Borough Council draft local plan (June 2016) and to the inclusion in the plan of Site Allocation A35 - the former Wisley Airfield - for a new settlement with 2000 dwellings.

Point 1. Erosion of the Green Belt.

I am a resident of West Horsley (my address is [redacted]) and my son and his family also live in Horsley. I moved to this area 4 years ago drawn by the unspoilt quality of the area and the sense of community in the village. The fact that these villages are in the Green Belt is fundamental to the reason why there has been tight control on housing development in these villages, maintaining the rural nature of this whole area. I strongly object to removing East and West Horsley from the Green Belt. The Green Belt is one of the best controls established in this country to make sure that we hold on to our green space, if we allow this to be lost in this area we will open the door to a steady urbanisation. This should not and need not happen.

Point 2. The Extent of Development Proposed

The proposed plan includes at least 148 more homes in E. Horsley, at least 385 more homes in W. Horsley, plus 2,068 homes on the Wisley site (2.1 miles away) 400 more at Burnt Common (3.2 miles away) and 2,000 at Gosden Hill Farm (4.2 miles away). This amount of development in such a small area borders on the ridiculous! There is no doubt that we need to be able to provide affordable housing for young people in this country but there have to be better ways than this - explosive housing development in a rural area. The social impact of radical change like this is never good.

Point 3. Pressure on Roads, Parking, Education and Medical Facilities

In all these development plans very little attention has been placed on the infrastructure that will be necessary to support the extra people who will be living in these new homes - the cars they will be driving, the schools the children will need and the medical services that will need to be stretched beyond the way they are now to accommodate so many more people. Just adding up the number of new homes in the developments described above gives a total of 5,000 new homes with a knock on of at least 5,000 extra cars (probably more), 10,000 plus more people to be catered for by NHS facilities and certainly several thousand children to be educated.

Lack of Imagination Developing Brown Field Sites

There is ample brown field land in areas not in the Green Belt. It is surely better to develop these and protect our green spaces for generations to come. Why, for example, in a small island like ours do we not encourage more apartment living? A broad sweep of development may well be an 'efficient' way of increasing our housing stock and is an approach which I am sure will be welcomed by building developers! But what is needed in these communities is flexible and moderate development which takes into account both the value of the rural environment and the capability of essential social facilities to support the housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPS16/6297</th>
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The development of the Wisley airfield site in Ockham would have a massive negative impact on the area, entirely changing the environment for existing residents and blighting daily life for all concerned. Public facilities are already overloaded. The heaviest impact would fall on the most vulnerable, especially the elderly.

The local plan would, in short, destroy the village community and turn the area into yet another bleak commuting dormitory.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6299  **Respondent:** 15588321 / Zoe-Amber Purves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECTTo : the planning on the Wesley Airfield site

Again no infrastructure : Transport ?
No regular busses to take people to the only 2 train stations near by, being Horsley or Effingham, which are both totally unsuitable for thousands more commuters either from the Wisley site or from the Horsley proposed sites. These train stations are small and serve the villagers at the moment, but could not accommodate thousands more commuters. Cobham Stn was mentioned in these plans as being a 'local station'? This is rubbish, as it is several miles away and the Wisley inhabitants would have fro go up the A3, or travel down the road by Wisley Lake to get there. This road which you are planning to close and make 'one way'!!

That road is used constantly by traffic coming from the M25 and the A3 by commuters and locals alike. It is a main thoroughfare.
The Wisley site needs busses to take the population to Guildford, Cobham.
They would need a Doctors Surgery, schools, junior and senior as all the local schools are over subscribed in the surrounding areas.

There is already a large Traveller site in Effingham, we as villages do not need any more sites for them, as our own children cannot buy houses, or build, or extend from our own properties, yet the Travellers can build on Green Belt at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6311  **Respondent:** 15588641 / Richard Purssell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The proposed development of nearly 600 houses in the Horsley area in addition to the proposed 2,000 house development at Ockham would have an enormous impact on the local infrastructure and is massively disproportionate to the existing housing stock and infrastructure. We fully understand the need to develop further housing but this has to be done proportionately and in areas where this can be supported rather than where it is already stretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The redevelopment of the Wisley Airfield site would only be acceptable if development was designed and constructed to be self-sufficient and separate from Horsley in terms of the provision of schools, medical facilities, shops, public transport etc. Consideration would also need to be given to the provision of additional parking at Horsley Station.</td>
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<td>There should be no major road widening in the area which would alter the character of the road system and villages; the road layout for the Wisley Airfield development should be designed to discourage journeys to Horsley and use of the lanes ie access and egress from the A3 only.</td>
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<td>I OBJECT to this policy for the following reasons:</td>
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<td>• <strong>The proposed development site</strong></td>
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<td>This development site is entirely within the Metropolitan Greenbelt. I can see no exceptional circumstances necessary to justify altering greenbelt boundaries stated within the draft plan. Thus the proposal is inappropriate development in the Green Belt as defined by NPPF paras 88 and 89.</td>
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<td>I also believe that:</td>
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<td>• A number of Public Rights of Way used by local residents cross this site.</td>
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<td>• The majority of the site (70.1 ha) is Grade 3 quality agricultural land which has been farmed for many years and produces over a million loaves of bread a year.</td>
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<td>NPPF para 79 states:</td>
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“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

I believe the above bullet points show the proposed development is contrary to this.

Therefore I OBJECT to Policy A35 as a breach of the Metropolitan Green Belt rules.

- **Impact on local traffic and infrastructure**

I have already commented under Policies I1, I2 and I3 about the serious deficiencies and shortcomings in the current infrastructure of East and West Horsley.

As I can find no specific proposals to improve the current infrastructure within this policy, the proposed development will serve only to increase these problems. Examples I foresee include:

- A severe adverse impact on road traffic in the surrounding area including my own village of East Horsley.

I calculate that the 2000 dwellings will generate what would be a considerable increase of approximately 3,000 cars locally. However there is no detail I could find on the Wisley Airfield website re improving local roads save for the rather bland statement:

“We’re also making improvements to local roads to reduce rat running, improve traffic flow and increase safety.

The proposals also see improvements to local footpaths and bridleways.”

This additional traffic is likely to use East Horsley’s two stations, shops, nearby schools and medical facilities.

The local roads are characteristically narrow winding ‘lanes’, many without pavements for large stretches. Some are poorly lit and others have a number of pinch points where it is difficult, and in some cases impossible, for vehicles to pass one another.

The road and junction changes which were mentioned previously as part of this development will increase traffic volumes through the village centre of East Horsley and around the station at Effingham Junction. These already suffer from traffic congestion at peak times.

- An increase in the risk of accidents.

Many schoolchildren cycle and walk along these through roads on their way to local schools. Ockham Road North and Ockham Road South have only narrow footpaths in many places through East Horsley village and Forest Road has no footpath in places.

There is concern of course for other pedestrians and cyclists. The number of cyclists has increased considerably - both locals and by groups riding in charity events, “Sportives” and for general recreation. Also the users of the narrow pavements - the elderly and infirm, parents pushing infants in pushchairs etc. – will be at increased risk.

The additional traffic will doubtless increase the likelihood of accidents and reduce the safety of their journeys.

- **Station Parking**

The Wisley Airfield website states that there are 9 mainline stations within 5 miles. The majority of inhabitants from this development would in fact travel from Effingham Junction or Horsley stations as they are the nearest stations. They are much quicker to reach than the other stations, especially at peak times. Further, it is cheaper and quicker to travel from these to London or Guildford (which would be the likeliest destinations) than from elsewhere.
Neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity, something I know from personal experience! The suggestion of the developer that large numbers of cyclists from Site A35 will cycle 6 or 7 miles each day along busy roads in order to travel to and from these stations lacks credibility.

The proposal plans to run buses through the site to major local destinations approximately every 10 minutes at peak times. Many commuters start very early and/or finish very late. It is unlikely these would be catered for. There is no local taxi service at Effingham Junction station so once again no doubt a car would be used—further increasing traffic volumes.

- Other village facilities in East Horsley

These include the medical centre and primary school. They will likely suffer adversely from a substantial increase in users as a result of this proposed development. I have commented more fully on these under Policies I1, I2 and I3

Accordingly, I OBJECT to Policy A35 on grounds of its severe impact on local traffic and infrastructure

- Health and Safety Concerns

The site is located close to one of the busiest road junctions in the country, the junction of the M25 and A3. It is not uncommon for traffic on the M25 to be at a standstill at various time throughout the day and at the A3/M25 junction during peak hours. This must be detrimental to the air quality in the proposed development area. Figures on the Wisley Action Group website in the past showed the Nitrous Oxide (‘NOx’) levels being above the EU limit of 40 mg/m3. This will surely affect residents of the proposed site. Also government policy prohibits the building of schools on sites in areas where there is high NOx. Therefore the proposal to build schools on this development must be contrary to this and thus not allowable.

Also the exhaust fume from the 3,000 cars which I estimate residents will own and use will increase the problem of poor air quality.

NPPF para 109 says:

“The planning system should contribute to and enhance the natural and local environment by” ….

“... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability”.

I believe that the points I have made above demonstrate that the proposed development runs contrary to the above NPPF paragraph.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse health & safety implications

- Local Character

Policy H1 of the draft plan states under “Density” that development should: “make the most efficient use of land whilst responding to local character, context and distinctiveness.” Policy A35 fails to do this.

The area in which the development is planned is essentially rural with many pretty villages, such as Ockham, East and West Horsley and Ripley containing historic, listed or protected buildings. The proposed development is large compared to these villages. It would create a community of just over 2000 dwellings. In comparison this will be 10 times the size of Ockham, twice the size of West Horsley and bigger than East Horsley.

I suspect that Ockham, a small historic rural village, will be subsumed into the Wisley development and doubtless, in the fullness of time, forgotten. Ockham is documented as being in existence in the Domesday Book of 1086 and has a number of historic buildings including All Saints, a Grade 1 listed building which has a nave and foundations which are partly 12th century, plus other parts dating from the 13th and 15th centuries. It is also the birthplace of William of Ockham, the famous medieval philosopher and inventor of the theory of Occam’s Razor. What a tragedy that a village so rich in our history should be treated thus.
I believe the overall housing density of the Wisley development is around 49 dwellings per hectare (‘dph’) which is effectively an urban density. It is to be achieved in part by building apartment blocks of five stories in height, according to the designs previously presented by the developer. Para 4.2.5 of the draft local plan says:

“all new development must be in keeping with the character of the surrounding area”

For a setting within the middle of rural Surrey this development is completely out of character.

East Horsley is just three miles from this site. With 1,760 homes it is the largest settlement in Guildford borough outside of Guildford town and has an overall housing density of 8.1 dph within its settlement area. Therefore, the proposed development under Policy A35 is six times as dense. Para 4.2.8 of the draft local plan says:

“Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope.”

However I have shown in my comments under Policies I1, I2 and I3 that the infrastructure is NOT able to cope.

The development is therefore inappropriate in terms of character and density with regard to the surrounding villages.

I believe the character of this whole area would be irreparably destroyed if this proposed development were to go ahead. The development therefore fails to respond to local context and as such is in breach of GBC’s own Housing Policy H1.

Thus, I OBJECT to Policy A35 on the grounds that it is out of keeping with local character, context, density and distinctiveness, and therefore breaches the NPPF and Policy H1.

• Historic environment

Policy D3 of the GBC proposed plan says:

“Heritage assets are an irreplaceable resource and 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.”

There are a large number of “heritage assets” in The Horsleys, Ockham and Ripley. These all help to contribute to the character, look and feel of the villages and the environment surrounding them, which is one of the reasons people like to come and live here.

Thus, I OBJECT to Policy A35 on grounds that it fails to meet the criteria set out in Policy D3, Historic Environment.

• Environmental Objections

It is nowadays recognised that building over the countryside stops rainwater draining away naturally into the earth, thus increasing the likelihood of flooding. The size and location of the planned development should therefore give cause for concern in this respect. The development is very close to, and slopes down towards, Ockham Road North (ORN) where it is prone to flooding. There is a recent example of such flooding in this area. During the winter of 2013/2014 ORN was impassable for a lengthy period due to flooding.

In addition, development of this scale would, in my opinion, increase light and noise pollution in its vicinity. This would affect both current local residents and existing wildlife.

Accordingly, I OBJECT to Policy A35 on grounds of its adverse environmental impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to changes to the Draft Local Plan.

I object to the fact that there has been NO change to the insetting of West and East Horsley from the Green Belt

I object to site A35 Three Farm Meadows still being included in the Local Plan and that it hasn't been removed despite the thousands of objections from both residents and consultees

The site is next to an extremely busy stretch of road and close to the very congested Junction 10 of the M25. Plans for improving the road do not take into account any development and the road system would not be able to cope

It is also next to the very popular RHS Wisley which has thousands of visitors a year and the effect of this traffic has not been considered

The site is not near any railway station so travel on the local roads would cause huge disruption and congestion. Other sites are much nearer train stations

There is no public transport and any suggested would have to negotiate the local narrow roads. Sustainable transport would not be possible as they would not be safe

I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re: Development of over 2,000 house village at Ockham (former Wisley Airfield) The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous. The plan also includes extensive developments at Burnt Common, (400 houses commercial developments) Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15591169 / Ollie Deatker</th>
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POLICY A35: Land at former Wisley Airfield Policy

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

Summary Surrey is a beautiful county enjoyed by the people from London and further afield, the beauty comes from the structure of open land, green fields and villages, which has been preserved through planning constraints and the Green Belt. The GBC Local Plan sets out to erode the green spaces of Surrey, put strain onto the infrastructure already under strain, and allow housing developments on a scale that is not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY A35: Land at former Wisley Airfield Policy

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.
irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

Summary: Surrey is a beautiful county enjoyed by the people from London and further afield, the beauty comes from the structure of open land, green fields and villages, which has been preserved through planning constraints and the Green Belt. The GBC Local Plan sets out to erode the green spaces of Surrey, put strain onto the infrastructure already under strain, and allow housing developments on a scale that is not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6454  Respondent: 15591393 / Carol Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

Allocation A35 – for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1. I object to the removal of the Airfield (FWA/TFM) from the Green Belt. The Green Belt was established to prevent urban sprawl from London and no exceptional circumstances have been established to warrant removal of this land from the Green Belt.
2. I object to the impact this development would have on transport and local roads, particularly
   1. The A3 and M25 roads are already congested and, when there are problems on either of these roads, the surrounding areas come to a standstill. This happens frequently.
   2. The car parks at Effingham Junction and Horsley Stations are very often full. The detrimental impact of a further possible 4,000 cars cannot be overstated
   3. The developers seem to think that the local population will suddenly take to cycling or walking, even though there are no cycle lanes and a lack of pedestrian footpaths.
3. I object to the fact that air pollution has not been given consideration. I understand that the air quality at the M25/A3 junction is in excess of EU-permitted levels and this can only become worse with more traffic.
4. I object to the fact that this site has been included as the planning application was unanimously rejected by the Planning Committee.

I cannot understand why Guildford Borough Council still feel this site should be included when there have been many serious concerns raised by a number of authoritative sources, including Highways England, Thames Water, NATS and the Environment Agency. There are brownfield sites in the area which would benefit from development without affecting historic local villages and causing untold problems for the local communities.

I trust these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6458  Respondent: 15591585 / John Thompson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I am stunned that having rejected the proposed development of Three Farms Meadows at the Council Planning Meeting, we, yet again, having to write to the GBC to reiterate the same things that applied from the start; the same things that were totally rejected before. So why are they on the table again? This, however, being the case, I include my objections to the Proposed Local Plan's inclusion of Three Farms Meadows below:
I object to the encroachment on the green belt, for which there is no justifiable reason. There has been no real
determination to use brown field sites (because of reduced profits for faceless property speculators)

I object as our road systems, already dangerously over-used, will not be able to cope with the increased traffic. I live in a
lane in Ripley which has no pavements and is already a dangerous place to walk, due to the volume of traffic. The same
is true of many of the residential roads in the area.

I object because the increased traffic will result in increased pollution and have a detrimental impact on the health of
local residents.

I object because the proposed building on this site would result in this part of Surrey becoming part of the urban sprawl
from London.

I object as there is no real improvement to local infrastructure to cope with this vast influx of people and that the figures
presented do not reflect the true number of houses required

I object as there are no plans for how to deal with increased sewage, water supplies and run offs.

I object as the creation of a town on the The Three Meadows site will not provide additional school places for years, long
after the houses begin to be built. This will create problems for local schools. Similarly, there are no plans for another
Doctors' Surgery.

I object to the local plan because The GBC are still dealing with a company registered in the Cayman Islands and,
therefore, anonymous money people. They are only interested in getting outline planning permission so they can sell on
their totally inadequate proposals for a profit of several hundred million pounds. They will then beat a hasty retreat and
leave the whole sorry mess to be put together by somebody else and to incarcerate hapless people for the foreseeable
decades into overpriced and under-planned mis-housing. We know that our villages have to grow, but in an organic way,
not by totally engulfing them into a sprawling new town.

The Borough Councillors are our representatives and, as such, should represent the views of those who elected them.
Election promises were made to protect the green belt which are now being flagrantly flouted. Listen to the views of the
people you represent and remove Three Farm Meadows from the proposed plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
who seek only to make a large profit. The real needs and wishes of the communities involved are simply ignored. Green belt is being exploited in preference to genuine brown field sites for this reason. Those who stand to make vast amounts from this site are registered in the Cayman Islands. They are not paying UK tax and have no interest in improving the lives of those of us who live in the borough.

My reasons for objecting to Policy A35, Three Farms Meadows, in the draft 2017 Local Plan are as follows:

**I object to the inclusion of this site in the 2017 Local Plan because** it will be adjacent to the most congested stretch of roads in the country, junction 10 of the M25. In addition to this, the neighbouring roads, many of which are little more than country lanes, which already carry a high volume of traffic, will be negatively impacted. Living in a narrow lane, which is already a rat run, I know only too well of the impact the development would have. When the increased traffic that is projected due to increased visitor numbers to RHS Wisley is added to this the result can only cause misery for those living here.

**I object to the inclusion of this site in the 2017 Local Plan because** alongside the very significant increase in traffic movements, there will be a very significant increase in air pollution. The quality of our air as a result of the heavy traffic on the M25 and A3 already fails to meet suggested limits. The increase in asthma, particularly amongst children in the area, is disturbing. As a child brought up here, I can attest that when I was a child asthma was unusual, not the norm as it has almost become today.

**I object to the inclusion of this site in the 2017 Local Plan because** the access to the train network from this site is highly problematic. The roads surrounding the development are little more than country lanes and the suggested solution, that commuters could walk or cycle to the nearest railway station, is ridiculous. To suggest a bus service to Horsley again is not viable. The prospect of walkers, cyclists and buses using these narrow roads is completely unrealistic. These lanes and unlit, have no footpaths, are barely wide enough for two vehicles to pass and, therefore, cycle lanes would be impossible.

**I object to the inclusion of this site in the 2017 Local Plan because** the increase in area is on the south of the site and faces the Surrey Hills ANOB. The projected building on this area, in places several storeys high, would be a true blot on the landscape of this protected area. The removal of a further 3.1 hectares of green belt land is totally unjustified and unnecessary.

**I object to the inclusion of this site in the 2017 Local Plan because** one of the major issues is the provision for dealing with the large amount of sewage that such a site will generate. This will prohibit the plan from contributing to the five year housing projection.

**I object to the inclusion of this site in the 2017 Local Plan because** the housing number and the fact that the council has not used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA.

**I object to the inclusion of policy S2 in the 2017 Local Plan because** it states that the figures in the Annual Housing Target Table add up to 12,426, when, in fact, they add up to 9,810. There seems no account taken of the missing 2,616. This anomaly suggests that the figures are not to be trusted.

I object to the inclusion of this site in the 2017 Local Plan because the council has failed totally to take into account all of the objections raised by those they purport to represent. This is to disregard the fact that they are our democratically elected representatives and have a responsibility to act upon the wishes of the electorate. The promise by those on the council when elected was to protect the green belt. This promise is being flagrantly broken.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID: PSLPS16/6461  Respondent: 15591617 / Andrew Van  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016)

and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) The plan has been based on the intention of adding 13,860 new homes to Guildford Borough over the 2013 - 2033 period, this represents a massive increase of 25% of the housing provision in just 20 years, the need for this huge increase has not been explained or justified, as neither has the basis on which the SHMA has been calculated. It is also the case that GBC has enhanced this figure to a level which is 70% higher than the official national estimates for population growth than the Borough. The GBC has no mandate from its residents to provide this additional level of housing and therefore has completely departed from the ethos of “localism” in planning policy.

The effect of Brexit will be to reduce the demand for housing nationally and the ability of the building industry to provide it, making GBC’s figures even more extraordinary.

2) I object to a plan which proposes that over 70% of the new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are for no good reason being forgotten and ignored.

3) I object to the disproportionate allocation of this new housing in this particular part of the borough which means that over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

4) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt, and its inclusion in the Local Plan as a site suitable for development. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The proposed removal of this site from the Green Belt by GBC only a few months after Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers is totally hypocritical, lacking in logic and integrity, and would seem to indicate the existence of an unduly coercive influence by the associated developers on some council members.

From what I have seen of the Local Plan Guildford’s planners, councillors and external consultants seems to have forgotten (or not be aware of) what gives the Borough and Surrey as a whole its unique character and the attributes which currently make it one of the most desirable places in the country to live in.

The first of these is of course that a good proportion of the Borough and indeed the county is countryside protected by the Green Belt, a piece of planning legislation which has given London its “Lungs” and prevented an unrestricted urban sprawl envied by most of the world’s capital cities.

The second is that quintessential element of the British countryside, small villages dotted about the county each with its own character, vernacular architecture, church and village green and individual communities.

The third attribute is the space that we enjoy by choosing to live in a rural and not an urban environment.

The proposals shown in the Local Plan spell out the destruction of what causes this part of Surrey to be unique and will devalue the quality of life of many of the Borough’s residents particularly in the Horsleys, Ockham, Ripley and Send.

5) For these reasons I also object to the proposed extension of the Settlement Boundaries of the Horsleys.
6) I also object to the Local Plan proposals for any significant increase in the population of the Horsleys, Ockham, Ripley and Send. Notwithstanding the effect of proposed development in these villages the provision of over 2,000 homes on the Former Wisley Airfield will add some 5,000 to 6,000 people to the area and probably 3,000 or more extra vehicles. This new community will need to get to their workplaces and schools and as there is no train station proposed for Wisley Airfield they will have to travel by car either by driving to Guildford or London or to the train stations at Horsley and Cobham. This will involve them accessing the A3 where the 3,000 vehicles would first have to go south to the Ripley/Ockham junction before going east to Horsley Station or north to London and Cobham.

At the present time at rush hour there are often queues northbound between the Ripley/Ockham roundabout and the Cobham roundabout and the addition of a further 3,000 vehicles at this time would cause these roundabouts to seize up and effectively close the A3. Those motorists lucky enough to complete their journeys via the A3 will find that there will not be any spare car parking at either of the stations (where there is no room to extend either the car parking or the platforms) and even if by chance they did find a space in the car park they probably would not find one on the train.

In the villages most of the primary foul water, surface water, electricity, gas, and telephone services are 80 or more years old, close to capacity and near to the end of their effective life. My personal experience of this is that in the six years that I have lived in Ockham Road South East Horsley the electrical supply to my part of the road has failed twice, once for five days and the second time for two days due as the electricity supplier told me, to the age and capacity of the mains cables.

Although new energy saving technologies and elements like sustainable underground drainage systems can to a degree reduce the impact of any new developments ultimately they still have to be provided with services form the existing primary utilities infrastructure which will not be able to cope or be renewed by the monies obtained from the anticipated community infrastructure levies.

Other resources which will be overwhelmed will of course be the local healthcare services (where appointments are already difficult to get) and many will be aware of the near impossibility of parking at Royal Surrey County Hospital. It is also the case that most of the local “country” roads already have difficulty in withstanding the onslaught of potholes following each winter, without the added attrition of 100’s of heavy good vehicles which will be unleashed when any significant development works start.

7) 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.

I trust that these objections will be fully considered and that the Local Plan will be redrawn to reflect the views and true needs of the local electorate, the parish councils and local action groups and not politicians with alternative agendas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. This land serves a vital role in protecting against urban sprawl from London. Development on this land would create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing this land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the draft Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the FWA/TFM), an area that at present has only 0.3% of the population of GBC.

5) I object to the threat the current draft Local Plan poses to the historic rural village of Ockham. The current draft plan contemplates that a conservation-protected village of 159 homes (many of which are grade 2 listed, with a grade 1 listed church), with narrow, winding country lanes (which are weight-restricted), no streetlights and very few pavements should 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.

6) I object to the detrimental impact on transport, local roads and road safety that such a development would inevitably entail. The local infrastructure, including the roads and railway networks, schools, medical facilities and even local drainage facilities cannot support such a contemplated development.

7) I object to:

1. The assertion that such a development would result in a meaningful shift to cycling and walking. The location of the FWA/TFM, surrounded as it is by narrow, winding country lanes, with no footpaths, remote from shops and the nearest commuter stations, mean that this assertion is demonstrably wrong. Even claims about the time it would take to cycle from the FWA/TFM to Effingham Junction station have been shown to be wrong.

1. The increased volume of car traffic that such a development would entail. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the narrow country lanes that surround the FWA/TFM.

1. The heavy traffic that such a development would entail during many years of construction, on our narrow, winding weight-restricted lanes.

1. The danger that such traffic would pose to those who use these lanes.

1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school as part of the possible development on the FWA/TFM would result in still further congestion at the M25/A3 junction, as well as on local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

1. The lack of suitable public transport. The local railway stations of Effingham and Horsley cannot cope with the increase in passengers that such a development would entail, and car parking is already at capacity.

8) I object to the fact that insufficient consideration has been given to the environment, ecological and agricultural value of the FWA/TFM - the Thames Basin Heaths' Special Protection Area (SPA) adjoins the FWA/TFM, as does a Site of Special Scientific Interest (SSSI). The nature conservation designation SNCI (Site of Nature Conservation Interest)
applies to almost all of the FWA/TFM. Rare flora and fauna abound and should continue to be protected. This land is predominantly high grade agricultural land which should continue to be cultivated.

9) I object to the fact that air quality concerns have not been taken sufficiently seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of legal limits. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

10) I object to the fact that no account seems to be being taken of the effect of acid deposition on the Thames Basin Heaths' SPA and its irreversible impact on the habitats of the many rare species of flora and fauna which the various nature conservation designations that apply to the FWA/TFM are designed to protect.

11) 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 reasons given to the question 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.

12) I object to the continued inclusion in the draft local plan of the FWA/TFM: a planning application for residential development of this land was unanimously rejected by GBC’s Planning Committee in April 2016: after 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC's Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about the proposed residential development of this land have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

13) I object to the inclusion of the FWA/TFM in the draft plan: it fails to take account of the value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which at least 19.3ha is classified as best and most versatile land).

14) I object to the inclusion of the FWA/TFM in the draft plan: claims have been made that FWA/TFM should be regarded as “brownfield” or "previously developed land". I believe these to be erroneous. The land is Green Belt land. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA, and the remainder of the old runway is (of course) flat and at ground level, meaning that any development would have a "major impact on the openess of the area". Much evidence exists that the adverse consequences of development of this land, including damage to the ecology of, e.g., the SPA, cannot be mitigated.

15) I object to the inclusion of the FWA/TFM in the draft plan: the impossibility in practical terms of creating a sustainable development on the FWA/TFM is further demonstrated by the historical use of, and lack of development of, this land and most recently by the inability of the current landowner/ developer and its many experts and advisers to come up with a sustainable development proposal despite numerous attempts over an extended period - unanimously rejected by GBC's Planning Committee - on the recommendation of its Planning Officers - in April 2016.

CONCLUSION

The above objections graphically demonstrate why the FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make this land totally unsuitable for any kind of significant development – as has been consistently argued.

The fact that the draft Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and decisions, disregards local and not-so-local opinion, and imposes significant cost and anxiety on local communities.

I continue to strongly OBJECT to:
I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. This land serves a vital role in protecting against urban sprawl from London. Development on this land would create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing this land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the draft Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the FWA/TFM), an area that at present has only 0.3% of the population of GBC.

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1. The danger that such traffic would pose to those who use these lanes.

1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school as part of the possible development on the FWA/TFM would result in still further congestion at the M25/A3 junction, as well as on local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

1. The lack of suitable public transport. The local railway stations of Effingham and Horsley cannot cope with the increase in passengers that such a development would entail, and car parking is already at capacity.

8) I object to the fact that insufficient consideration has been given to the environment, ecological and agricultural value of the FWA/TFM - the Thames Basin Heaths' Special Protection Area (SPA) adjoins the FWA/TFM, as does a Site of Special Scientific Interest (SSSI). The nature conservation designation SNCI (Site of Nature Conservation Interest) applies to almost all of the FWA/TFM. Rare flora and fauna abound and should continue to be protected. This land is predominantly high grade agricultural land which should continue to be cultivated.

9) I object to the fact that air quality concerns have not been taken sufficiently seriously -- air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of legal limits. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

10) I object to the fact that no account seems to be being taken of the effect of acid deposition on the Thames Basin Heaths' SPA and its irreversible impact on the habitats of the many rare species of flora and fauna which the various nature conservation designations that apply to the FWA/TFM are designed to protect.

11) 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 reasons given to the question 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.

12) I object to the continued inclusion in the draft local plan of the FWA/TFM: a planning application for residential development of this land was unanimously rejected by GBC’s Planning Committee in April 2016: after 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC's Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about the proposed residential development of this land have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
13) I object to the inclusion of the FWA/TFM in the draft plan: it fails to take account of the value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which at least 19.3ha is classified as best and most versatile land).

14) I object to the inclusion of the FWA/TFM in the draft plan: claims have been made that FWA/TFM should be regarded as "brownfield" or "previously developed land". I believe these to be erroneous. The land is Green Belt land. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA, and the remainder of the old runway is (of course) flat and at ground level, meaning that any development would have a "major impact on the openness of the area". Much evidence exists that the adverse consequences of development of this land, including damage to the ecology of, e.g., the SPA, cannot be mitigated.

15) I object to the inclusion of the FWA/TFM in the draft plan: the impossibility in practical terms of creating a sustainable development on the FWA/TFM is further demonstrated by the historical use of, and lack of development of, this land and most recently by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development proposal despite numerous attempts over an extended period - unanimously rejected by GBC's Planning Committee - on the recommendation of its Planning Officers - in April 2016.

CONCLUSION

The above objections graphically demonstrate why the FWA/TFM was and should remain in and be part of the Green Belt, and why the location, limited size, lack of infrastructure, relative isolation, distance from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make this land totally unsuitable for any kind of significant development – as has been consistently argued.

The fact that the draft Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and decisions, disregards local and not-so-local opinion, and imposes significant cost and anxiety on local communities.

I continue to strongly OBJECT to:

the inclusion of the FWA/TFM and other parts of Ockham Parish in the draft local plan as possible sites for housing development and

their proposed exclusion from the Green Belt.

I trust that these objections will be fully considered and that the Former Wisley Airfield/ Three Farms Meadow, Allocation A35, will now be removed from the draft Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6469</th>
<th>Respondent: 15591841 / Arthur Perkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I particularly object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The road network south to the Horsleys and towards A246 and to Effingham has narrow roads, very narrow in places, that are not suitable for the increase that would arise in business traffic – including the proposed increase in buses.

The plan has a statement which would allow the council to not build a school that is currently stated as part of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6523  Respondent: 15594817 / Toni Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6534  Respondent: 15595041 / Richard Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Impact of the development at Wisley Airfield on local traffic and infrastructure

The villages of East Horsley, Cobham and Ripley, along with the roads around Effingham Junction station, already suffer from traffic suggestion at peak hours. The development will only increase traffic volumes in all these areas.

Furthermore, neither Horsley nor Effingham Junction railway stations currently have any significant spare parking capacity. As the roads between the proposed development and the stations are not suitable for cycling and there is no bus service, residents at the new development will have to drive to, and park at, both stations. The proposed development will therefore only exacerbate parking at both stations.

Also many of the roads in the surrounding area are country lanes, which are not suitable for the major increase in traffic that would result from the proposed development.

I there object to the development on the grounds of its severe impact on local traffic and infrastructure.

Impact on health and safety of the development at Wisley Airfield

The site is located close to the junction of the M25 and A3, where recorded Nitrous Oxide emissions are very high. This will therefore have a detrimental effect on the health of residents in the proposed site.

Furthermore, the proposal includes the building of a new primary and a new secondary school. This is in contravention to government policy which prohibits the building of schools in areas where there are high Nitrous Oxide levels.

I there object to the development on the grounds of its unsuitability on health and safety grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6539  Respondent: 15595137 / Sheila Keogh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

 Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

- We object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

We reflect objections from our family and friends who regularly visit us and benefit from the current surroundings and are acutely concerned about the changes proposed.

We trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

- We 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.

  - We object to the detrimental impact on transport, local roads and road safety. We specifically object to:

    1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
    2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
    3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
    4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
    5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
    6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

  - We object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

  - We object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
We 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.

We object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6563   Respondent: 15595457 / Mark Shoebridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to strongly object to the above proposed development. Having just returned from a morning of cycling and walking in this beautiful green belt area, this is a much needed green belt space and must remain so to protect the local wildlife and countryside as it is.

The development plans look way top heavy for the local area.

The roads and surrounding small villages will be swamped by the traffic from the service vehicles needed for building the development and then congestion from the additional residents from the development.

Traffic at the M25 and A3 junction is already at bursting point at peak times.

I believe there is supposed to be a plan for the residents to cycle but where are the plans for this.

No exceptional circumstances have been identified to allow this development on green belt land

There will also be a huge demand on local amenities, schools (already over subscribed), doctors, dentists, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6572   Respondent: 15595553 / Carol Davis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the continued inclusion of the site A35 Formerly Wisley Airfield (Three Farm Meadows), Ockham in the Local Plan. A35

This planning application was recently unanimously rejected by GBC's planning committee on the recommendation of the GBC planning officers who had grave concerns about the application.

I objected to this application on a number of grounds including the quality of the agricultural land, the impact on wildlife and the complete lack of infrastructure to support such an application. The road system is already at a standstill and even with the proposed new junction on the A3 (which has so obviously been added to the plan at the very last minute as a means to support this enormous housing development and the proposed development at Gosden Hill A25) the impact on the local villages and environment would be enormous. Flooding in that area remains a huge problem and cannot be ignored.

Serious concerns about this site were also raised by the Environment Agency, Thames Water and Highways England

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/6594  **Respondent:** 15596193 / Ingrid Dupre  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Objection to Guildford Borough Council’s Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –**

**Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I object to the draft Local Plan for the following key reasons:

1) It is in all our interests to protect Green Belt sites from development. This was promised in the Election manifesto.

2) The proposed site, Former Wisley Airfield (FWA/TFM) is on Green Belt land. For this reason I object most strenuously to 70% of this Green Belt land to be taken and used to build 2100 new dwellings.

There is ample brownfield land in urban areas which needs to be regenerated instead.

3) The FWA/TFM) site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA). This is far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

5) I object to the disproportionate allocation of housing in this particular part of the Borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
6) 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.

7) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

9) I object to the fact that air quality concerns have NOT been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

10) 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:

- Access to the countryside and clean air
- 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.

11) I object to the continued inclusion of a site FWA/TFM where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), the planning application of Wisley Property Investments Ltd (WPIL) was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6622  Respondent: 15596897 / Fia Ali Khan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the Borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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:

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Comment ID: PSLPS16/6712  Respondent: 15601441 / Valerie Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

As a regular visitor to the area, where many friends live, I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
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  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure...
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6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the disproportionate allocation of housing in this particular part of the Borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
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- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
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- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6723</th>
<th>Respondent: 15601793 / Daphne and David Annett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</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>Re: Objection to Guildford Borough Council draft Local Plan (June 2016)</td>
<td>We strongly object to the inclusion in the Guildford Borough Council draft Local Plan (June 2016) of Site Allocation A35 namely the Former Wisley Airfield for a new settlement of 2,000 dwellings. For the following reasons:</td>
<td></td>
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<tr>
<td>• The Former Wisley Airfield should NOT be removed from the Green Belt, as it serves a vital role in preventing urban sprawl from London and a development there would create an urban corridor stretching from London to Guildford.</td>
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<tr>
<td>• No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.</td>
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<tr>
<td>• There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.</td>
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<tr>
<td>• Such a development would have harmful impact on transport, local roads and road safety. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.</td>
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<tr>
<td>• The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development – Cobham Village...</td>
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</tbody>
</table>
could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those already increasingly using local roads for recreational purposes).

- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. Any proposed secondary schooling would add additional congestion.

- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernion Station could be used – that, or use of stations further north at Weybridge or Walton, would increase congestion and pollution on local roads in Elmbridge.

- Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

- Insufficient consideration has been given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

- On 8th April 2016, there was unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on the recommendation of its Planning Officers. The Planning Report identified the serious concerns now being highlighted above.

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>PSLPS16/6734</th>
<th>Respondent:</th>
<th>15601953 / Stephen Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6733   Respondent: 15602049 / Fiona Williams   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

Dear Sirs,

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to site A35 Wisley Airfield – 2000 homes that are totally inappropriate and unsustainable development in the Green Belt. This is a hugely disproportionate amount of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6745  Respondent: 15602241 / Mark Holman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Wisley Airfield being developed with over 2,000 new houses. It is too many in a very small village of outstanding natural beauty.

I object to this development on the grounds that roads are narrow and already have too much traffic from A3 and M25. I am a regular visitor to this area with my wife's parents in the village and myself having been brought up in Wisley.

No Schools could cater for this many homes and Howard of Effingham and other surrounding schools already have waiting list. This will change the whole area and I strongly object to this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6746  Respondent: 15602273 / Phillip Herrington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, I also object to Policy A35 (WISLEY AIRFIELD). I don’t believe this should be in the plan for all the same reasons the Planning Committee rejected the ?identical recent proposal by Wisley Investment Properties. ?This is not a brownfield site as stated – only 15% of it. Anyone that has been on the A3/M25 Junction recently will know how impossible it is to join the motorway with existing traffic volumes, access is confined to inadequate narrow lanes and there is no existing public transport and no train stations in the locality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6751  Respondent: 15602529 / Darren Lambert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6762  Respondent: 15602625 / Margaret Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6765  Respondent: 15602721 / Paige Marskell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object as a local resident to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling
   2. The increased volume of car traffic. A proposed development of 2,068 homes
   3. The congestion this traffic will cause on the narrow rural roads in Ockham
   4. The danger this traffic will be to local cyclists and pedestrians
   5. The increase in the already severe congestion on the Strategic Road Network
   6. The lack of suitable public transport. The local rail stations of Effingham

The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars would result in an estimated 4,000 additional cars on the roads

the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8 the April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objection to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation 35 - for the phased development of a new settlement of up to 2100 dwellings

Dear Sirs,

I would like to register my objection to the above draft local plan for the following reasons:

**Green Belt:**

I object to the proposals to build on Green Belt land and understand that green belt boundaries can only be altered in exceptional circumstances and I do not believe that there has been any demonstration of the special circumstances required in this case. The development would be a massive encroachment of the Metropolitan Green Belt and would as I understand it be inappropriate development (as defined by law) within that.

There are many brownfield sites which are more appropriate for redevelopment which are currently not being utilised.

I object to the removal of Wisley Airfield from the Green Belt and believe the protection of green belt land to be important for many different reasons and feel strongly that this proposed development would have an adverse impact on the surrounding area: it would lead to the urbanisation of a rural area of which there are not many near and around London, it would have a negative impact on wildlife, in particular in leading to the loss of habitat for a number of protected and endangered species and would lead to a loss of green space currently enjoyed by walkers, horse riders and cyclists amongst others.

Additionally, I am concerned that election manifesto promises to the electorate are being ignored.

**Impact on the local area:**

I have lived on Ockham Lane for 10 years and have seen the number of new homes and volume of traffic increase substantially in the area during this time. The proposed housing density and multi-storey buildings in these proposals are out of keeping with the surrounding rural area and there is already an obvious strain on the local infrastructure with problems related to roads, traffic and parking and severe pressure on local services including those provided by doctors, dentists, shops and schools.

I am concerned that insufficient consideration has been given to the ability of the local infrastructure to cope with the additional homes and the associated developments and vehicles that will come with them, the detrimental impact on road safety and the negative impact on current residents within the area. The major increase in traffic to and from the site is not compatible with the narrow country lanes in the area and will exacerbate the current traffic issues and congestion. Traffic is already frequently at a standstill in the area and such a significant increase in the volume of cars can only lead to further traffic issues in an already over-crowded area.
I object to the proposed number of houses, the disproportionate allocation of housing and housing density planned for this part of the borough which is out of keeping with the rural area. In light of the recent Referendum and the UK’s forthcoming withdrawal from the EU it is clear that there will be smaller numbers of migrants coming to the UK and therefore less pressure on housing and a reduced need to build new homes.

Consideration does not appear to have been given to the negative impact of such a substantial increase in population to the existing residents of Cobham, Downside and Hatchford. I am concerned that the impact on light pollution, traffic and infrastructure has been significantly underestimated and that suggested measures in mitigation are inadequate.

Additionally, insufficient consideration appears to have been given to the environmental and ecological value of the site (site of special scientific interest (SSSI) etc) and air quality concerns and the serious concerns raised by many authoritative sources including Highways England, Thames Water and the Environment Agency amongst others.

Other concerns:

I am concerned by the fact that a developer has been trying to gain planning permission for these exact proposals for several years and that it is therefore expedient for these original proposals to be utilised, rather than this site being selected, objectively, as an appropriate site for development. I am concerned that the council is now putting these proposals forward having vigorously and unanimously objected against them only two or three months ago citing many of the serious concerns I and other local residents are raising in our objections.

I am concerned about the fact that these plans do not meet the needs and wishes of the local communities as evidenced through the Ockham Parish Plan and the unacceptable level of stress that these and the previous proposals have placed on many local residents for many years.

In summary, I am concerned that this is not the right place for additional housing and development and that the impact and above issues have not been properly thought through and are unacceptable to those living in the area. I would be grateful if these concerns could be taken into account and hope that the former Wisley Airfield will be removed from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
  7. Whilst I live in Elmbridge I consider that this proposal will severely impact Cobham and Stoke D’Abernon as well. Its inconceivable that Cobham will not suffer substantially increased traffic, to the railway station in particular which is bound to share some of the load with the designated stations.
8. I also regularly enjoy the tranquil environment of the public footpaths across this local area and shudder to contemplate the impact of the equivalent of a new town being squeezed onto this site.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
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  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
  7. Our Queen’s speech at the opening of Parliament one month ago our queen said “a promise to ensure transport and buses will not be reduced and this would be for the Mayor to ensure” - proposed local bus services have been proposed locally and now we hear the same for many train services.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
• I object to all the proposals mentioned above and we feel because of the result of the recent Referendum result it is imperative for the Guildford Borough Council to go “back to the drawing board” to reassess the numbers of properties which would be needed within Surrey together with providing information on infrastructure and additional facilities required. These numbers of properties required will certainly be extremely different to the calculations made before the Referendum!

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6809  Respondent: 15604833 / Susan Vaughan Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to voice my very great concern that this proposed development site remains part of the Draft Local Plan on the basis of its potential effect on air quality.

1. On 9th February 2016 the European Lung Foundation produced a paper following a study conducted in Canada on the effect of maternal diesel particulate inhalation during pregnancy resulting in a significantly increased incidence of neonatal and childhood The summary of this paper is attached for information.

2. Guildford Borough Council undertook an air study in 2013 the results of which are also appended.

It revealed that station 5 (Junction 10 M25/A3 - Wisley) had the highest air pollution recorded of all stations tested.

1. Further evidence of this was also produced by:-
   1. Surrey Your Air Millennium Report
   2. Surrey Future Congestion Programme 2014
   3. A3 corridor improvement appendix.

2. Within my former practice as a GP with a special interest in paediatrics, I have hitherto been all too well aware of the hazard to young children in pushchairs of inhaling diesel particulates causing resultant childhood asthma

3. This latest research suggests a whole new level of threat to the unborn infant based on maternal diesel particulate exposure during The traffic implications of the additional 2,100 new homes planned for the Wisley Airfield site will inevitably increase air pollution in a place which already has the most significant air pollution in Surrey.

4. In turn this will produce a substantial increase in serious child health consequences

5. For this reason alone the site should be removed from the proposed 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: PSLPS16/6822  Respondent: 15606977 / Grant Jux  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- 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.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

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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 draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
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- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6841  **Respondent:** 15607937 / Joanna Kaminska-Hine  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 the strategic site at Wisley airfield as this has recently been denied planning permission due to many of the above reasons, as such why is it to be included again, many of the reasons it was reject are not solvable due to its location and the nature of the site. Or is it the case that the council will allow development here regardless due to the revenue they can generate from council tax?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6842  **Respondent:** 15608065 / Michael Rodd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to the inclusion in the Draft Local Plan (June 2016) of Site Allocation A35 - the former Wisley Airfield - for a new settlement with 2,000 dwellings

We wish to register our objection to the proposal to remove the former Wisley Airfield from the Metropolitan Green Belt in the Guildford Local Plan and make the site available for large scale housing development.

We believe that the new and exceptional circumstances required in law for such a change have not been established. We further believe that there are many opportunities in the Borough for housing development in established urban areas without the need to destroy an essential safeguard to the environment of all of us.

This change to the Local Plan would have a serious, negative impact on local communities including our own in Cobham. As the nearest town of any size to the new development Cobham would become the first port of call for many of the services required by those living in the new homes. Our already overstretched roads and public transport links would come under ever greater and unsustainable pressure. We are in no way geared up for such an increase in population and the demands that would accompany it.
The historic communities close to the site - most notably, but not exclusively, the small village of Ockham - would be engulfed in the new town which includes, in a recently presented proposal, buildings of five stories. The rural character of these communities would be destroyed and the result would be a denser concentration of people here than is found in many of our major cities. This reality alone would be sufficient grounds for the strongest objection to the proposed change.

It has been seriously proposed that the new community on the airfield site will turn significantly to walking and cycling rather than depending on road transport. One only has to look at the volumes of traffic currently using our local road network to realise how unrealistic that suggestion is. Our present roads do not cope with the demands that current traffic levels make of them. How much worse - and how considerably less safe - will the addition of substantial numbers of extra vehicles make? Such a development could well lead to more than 4,000 additional private cars trying to use our roads plus all the commercial vehicles needed to service such a new town.

People today assume they will be able to use their cars. It would, in our opinion, be unrealistic to approve a plan based on a belief that cycling and walking will provide an answer to our infrastructure limitations.

Wisley Airfield is not the right place for large scale housing development. We object strongly to the proposed change in the Guildford Borough Local Plan that would prepare the way for such a development and remove the protection to our Green Belt that has served us well for so long.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• 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.
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After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

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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.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/6883  Respondent: 15609569 / Nicola Shouesmith  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

   - I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
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   - 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.
   - I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

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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:** PSLPS16/6926  **Respondent:** 15610657 / Jennifer Hayward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?**  ( ), is Sound?  ( ), is Legally Compliant?  ( )
Objections to Guildford Borough Council Proposed Submission Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I STRONGLY OBJECT to the draft Local Plan for the following key reasons:

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. 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 object to the detrimental impact on transport, local roads and road safety.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.
- After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
- Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6929  Respondent: 15610753 / Jim Perrin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
As a regular visitor and former resident of East Horsley, I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
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  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPS16/6951</th>
<th>Respondent:</th>
<th>15611361 / Elizabeth Maycock</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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Guildford Borough Council 2016 Draft local Plan Response to Consultation: Policy A35 land at former Wisley Airfield, Ockham I write to object to the inclusion of this site again in the latest draft of the Local Plan as a strategic site for development. A planning application for this site in effectively the same terms was decisively rejected a few weeks ago on clear and logical grounds. It is difficult to understand what could have changed in that few weeks. The arguments against building in the Green belt remain the same. The site can only be removed from the Green Belt on exceptional circumstances and the Local Plan provides no details as to what these may be. Unfulfilled housing need is not an exceptional circumstance for these purposes. I also object to the inclusion of this site on the grounds of poor sustainability. There are no transport links or other services such as schooling, shopping or medical services which means that these will have to be provided by the existing stretched services in the surrounding area or provided from new. The number of houses proposed can only generate a massive increase in vehicle use of the local narrow roads and add to the existing problems at the A3/M25 junction 10. At an average of two cars per dwelling, there will be an increase of some 4000 extra vehicles on local roads. There will also be many more passengers on the trains at East Horsley and Effingham stations at both of which there is almost no excess parking available now. The same difficulty will arise in relation to parking at the shops in East Horsley. As the area immediately surrounding the site is prone to flooding, the proposed development will require extensive improvements to surface and waste water infrastructure to cope with the much increased surface water run off and extra foul waste. The existing infrastructure simply cannot cope with such an increase in population.

Ockham village currently has 159 dwellings and its present setting will effectively disappear if this site is developed as proposed. The concept proposed is completely out of keeping with the established pattern of development in the area and would be the largest in Guildford Borough other than Guildford itself with a density would be about 49 dwellings per hectare. East Horsley is presently the largest settlement outside Guildford town, having 1760 homes at a density of 8.1 dwellings per hectare. The disparity is stark and emphasises the fact that the proposed development is wholly out of local context. It even appears to breach Guildford Borough Council's own proposed Housing Policy (H1). I also object to the allocation of housing in this part of the Borough which is disproportionate in relation to the Borough as a whole. Calculation shows that 23% of the Local Plan's new housing is proposed in the localities of Ockham, Ripley, Send and the Horsleys and of this 65% is allocated to the former Wisley Airfield. This is wholly unreasonable and unjustified by the Local Plan.

**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:</th>
<th>pslp172/4043</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 continue to object to the inclusion of policy A35, Three Farms Meadows, in the draft Local Plan. Much of the above general comment is also applicable to this site. Primarily, the proposal removes 3.1h of land from the Green Belt without any justification. There are no special reasons for this as such for it is effectively unsustainable because of its location and the constraints of the site. Junction 10 of the M25 is already unworkable at times and even the proposed improvement of the junction (how many years away?) will not alter the totally restricted access to this site from the A3/M25. In this respect, it will rely at that end on the same junction on the A3 as RHS Wisley, a major visitor attraction with its own plans for expansion. The access at the other end of the A35 site is from narrow country lanes and any substantial increase in traffic including bus services there will make them even more dangerous than they are now and increase the deterrent effect on walking/cycling to the sewerage, lack of medical service, schools, transport connections in the surrounding areas as well, all contributing to the site's total unsustainability.

Quite apart from the wholly unsustainable nature of the site on all levels. any substantial development of it, such as that presently proposed and under appeal, will have an overwhelming effect on the Horsleys and other nearby villages, already faced with proposals for their own expansion in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
All our local services would be stretched far beyond their capacity to cope. Cobham is already very congested with limited parking and this is the obvious place for people from such a development to shop and attend doctors surgeries, dentists, etc. We simply can’t cope with such an increase, which would change the whole character of the area very much for the worse, also having a very damaging effect on local wildlife.

We would urge you very strongly indeed to reject this proposal especially in the light of the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of planning officers with the above serious concerns being highlighted

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

Hannah

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7008  Respondent: 15616161 / Anna Joyce  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which I do not believe to be accurate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7039  Respondent: 15618529 / Angus Jordan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA) now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings
I wish to object to the draft Local Plan in the strongest possible terms, for the following key reasons:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored and this simply appears to put money in the pockets of overseas investors rather than doing something useful with land that needs regeneration rather than conservation as the greenbelt does.
2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in...
protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. Where has this number come from. They should not be used without complete clarity and transparency.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). This does not equate to a reasonable and fair process of distributing new housing.

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heath SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT also to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. (Application reference 15/P/00012) This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again. This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. (Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director & descendant of the David Cameron).

Policy A35 should be removed from the plan for all the reasons the development was rejected by the Planning Committee, including:
  • Green Belt location and absence of “exceptional circumstances”.
  • Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
  • Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
  • Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
  • Absence of adequate traffic data.
  • Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
  • Loss of high-quality agricultural land (55% of the site), in breach of national policy.
  • Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
  • Presence of a Surrey County Council safeguarded waste site.
  • Cost of infrastructure required to the detriment of alternative more favourable sites.
  • Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
  • Impact on listed buildings.
  • Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
  • Extreme housing density with tiny garden spaces.
  • Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
  • Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14). (The River Mole would flood even more badly should a new runway be built at Gatwick.)
  • Failure to evaluate the cumulative impact of this and nearby development sites on the area.
In addition I object to the following policies in the Town Plan:—

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7076  Respondent: 15624705 / Chanelle Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• 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 object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  • The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

  • The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

  • The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

  • The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

  • The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
• The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• 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.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to site A35 Wisley Airfield, a 2000 homes development in the Green Belt. This will increase traffic in an already busy location on the A3 junction with Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7112  Respondent: 15627393 / Brandon White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy A35

**Land at former Wisley airfield, Ockham Page 203**

More detail is required in the column headed, “Requirements” regarding the potential interventions that will be required to address issues on B2215 Ripley High Street. This comprises two slip roads at A247 Send. If the land necessary for these has now been secured, is presumed that there will not be a problem in linking these to Wisley.

Some 17 ha is allocated for waste management use under Policies WD2 & WD5 of the SWP and is also considered suitable for aggregate recycling. The proposed allocation contains no specific waste use allocation other than an allocation for general industrial purposes which could in principle include some suitable, but smaller scale, waste uses (see below).

The county council would wish to see part of the site continue to be allocated specifically for waste management purposes (the county council acknowledges that much less than 17 ha would be required for waste management purposes - perhaps of the order of 5 ha including any necessary environmental buffer). Therefore as waste planning authority, we object to this proposed policy as it involves the loss of this waste management site and is therefore contrary to SWP 2008 Policies WD2 and WD5 and government policy contained in the NPPW. We consider the Plan to be unsound in terms of being positively prepared in that it does not take account of this acknowledged requirement for waste management facilities and the SWP allocation.
In view of the ongoing need for additional waste management capacity in Surrey, including for the recycling of construction and demolition waste, the proposal would prejudice the successful implementation of the SWP by reducing land availability for such uses and limiting flexibility to make adequate strategic provision. As such it will fetter the implementation of the waste hierarchy and undermine the targets included in SMP Core Strategy Policy MC5 for the production of alternative aggregates in Surrey.

The county council is currently in the early stages of preparing a new waste plan that will consider the need for new waste management capacity in the county.

It should be noted that the wording relating to primary school provision in policies A25, A26 and A35 is not consistent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Finally, no assessment has been made of the collective impact on the area of the Wisley development and the 6 Horsley sites.

Please do not let the legacy of this council be one that destroys the greenbelt, impacting the next generations irrevocably and eroding thousands of years of history, character and place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7330  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY A35 (WISLEY AIRFIELD):
• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. • Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application). • Unacceptable Conservative Party links between the developers and the Council. • No Green Belt “exceptional circumstances” presented. • Not a brownfield site as stated – only 15% of it. • Proposed SCC waste site ignored. • Loss of farming land. • Too near RHS Wisley and Thames Basin Heath SPA. • SANG would harm on SPA. • Will aggravate traffic jams at A3 roundabout and M25 Junction 10. • Unacceptable increase in air pollution. • No existing public transport and stations miles away. • No proper traffic data. • Housing density far too great. • Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings. • Access confined to inadequate narrow lanes. • Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole. • Major impact on neighbouring villages, especially Ripley, Send and the Horsleys. • No assessment has been made of the collective impact on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7337  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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.

**I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows)**

where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attended documents:**

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**Comment ID:** PSLPS16/7356  **Respondent:** 15642881 / Douglas Denham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Ockham - New Settlement

**I strongly object** to the proposal to use farm and previously requisitioned land at Ockham for 2,100 houses. The impact on the Horsleys would be enormous and completely change the character of the area and is unsustainable. Planning permission has recently been refused for numerous reasons and the site should therefore be removed from the Plan. Somebody is clearer making a lot of money out of this and it needs to be investigated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attended documents:**

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**Comment ID:** PSLPS16/7374  **Respondent:** 15644577 / John Cotton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO site A35 Wisley Airfield - 2000 homes that are totally inappropriate and unsustainable development in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attended documents:**
Comment ID: PSLPS16/7417  Respondent: 15645601 / Peter Drew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Scale of development at Wisley Airfield

Priority is given within the plan to the development of brownfield sites, of which Wisley is one. My objection is not about the development of the site as such, but more to do with the scale of the proposed development. As mentioned above, the A3 / M25 interchange and M25 itself are at gridlock in the morning. The proposal to add this number of additional dwellings next to this interchange will only make matters significantly worse. Furthermore the impact of this number of houses on the other amenities and infrastructure within the area will be highly significant. A smaller, more reasonably sized or lower density development would reduce this impact to more manageable levels. This is particularly relevant when taken in conjunction with the proposed 2,000 houses for the Gosden Hill Farm and 400 at Burnt Common, just up the A3.

So in summary, the plan in its current format, would significantly impact the character of Horsley and its surrounding areas and well as have a damaging affect on its roads, schools and other amenities.

The plan needs to be revised to take a more balanced view between the need for further housing in the area and the hugely negative impact it will have on Horsley and its surrounding areas.

I urge, in the strongest possible terms that the Council and its elected representatives review the plan accordingly. Most importantly, it is essential that the proposal to remove Horsley and surrounding villages from the Green Belt be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7465  Respondent: 15649345 / Matthew Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. In line with Central Government guidance I OBJECT to development on areas of high agricultural value. This includes Wisley airfield. If it is necessary to build on agricultural land it should be of low quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7467  Respondent: 15649345 / Matthew Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to the inclusion of A35 Wisley airfield in the local plan. The principle of the local plan is a presumption in favour of sustainable development. The Housing and Planning Act 2016 grants permission in principle to any development included within the local plan leaving only technical details to be considered by planning authorities. The site at Wisley failed in its planning application on a large number of points including infrastructure and sustainability. It is highly unlikely that these will be met in the future due to its positioning. Part of the site is green belt and no exceptional circumstances have been demonstrated. Aspects of the site also include high quality agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7531</th>
<th>Respondent: 15650625 / Andrew P Donnell</th>
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<td>Ockham Airfield - This has already been declined so why is it included again. This s planned is a stupid idea and driven purely by financial gain with no consideration for local concerns, environment, traffic and bio diversity.</td>
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<td>I am writing once again to state my objection to the revised local plan that has been prepared. It is clear that you have not taken into account the views of 1000’s of local residents and qualified people on the environmental impacts of the proposed plans. There is still too much development into green belt, which must be protected and a distinct lack of thought of the required infrastructure to support any of this building. The proposed development at Wisley which has already been rejected??but is still in the plan is ridiculous in terms of size. The roads cannot take this, it will be like central London and the A3 is one of the busiest junctions, with regular accidents and this will only increase. Clearly we need to increase housing stock but this has to be proportionate to the local surroundings, infrastructure and existing stock. This plan is clearly not and needs to be reconsidered AGAIN.</td>
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I OBJECT in the strongest possible terms to the proposal to develop a 2,000 house village at the former Wisley airfield, a site that forms part of the Metropolitan Green Belt and a 'first line of defense' against urbanisation from the A3 and M25. Guildford Borough Council's Planning Officer, in rejecting a previous planning application from the developer said 'it has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and other harm identified'. The proposal would be disastrous not only for East and West Horsley but especially for the local villages of Ockham, Hatchford and Downside. Anyone with local knowledge of the area will appreciate the strain such a proposal would place on local transport and infrastructure. Why does Guildford Borough Council continue to include this site in its plans in the face of massive objections from residents from across the area? I consider this proposal to be an act of ENVIRONMENTAL VANDALISM.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY A35 WISLEY

I object to Policy A35 Wisley. I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. However, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPS16/7613</th>
<th>Respondent: 15657121 / Robert Wheeler</th>
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<td>I object to site A35 Wisley Airfield again 2000 homes that are totally inappropriate and unsustainable development in the Green Belt</td>
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<th>Comment ID: PSLPS16/7679</th>
<th>Respondent: 15662305 / Debby Hallett</th>
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<td>I object to the removal of the Former Wisley Airfield from the Green Belt. No exceptional circumstances have been demonstrated.</td>
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<td>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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<td>I object to inclusion of the former Wisley Airfield, now known as Three Farm Meadows, creating a policy seemingly to counteract the fact of the planning application already being refused by GBC’s Planning Committee.</td>
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<td>After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.</td>
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<td>Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.</td>
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<td>I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.</td>
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</table>
Comment ID: PSLPS16/7767  Respondent: 15672737 / Andrew Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 proposed buildings and building sites in general. Whilst I understand there is a need for local housing these villages should be considered separately from any ‘country wide’ suggestion, they are unique and require individual consideration. If the Wisley Airfield site goes ahead this will already add 2000+ homes within a 2 mile radius of the existing villages? More homes and sites would just be a further assault on the current village infrastructure. If Wisley Airfields is to be one of the sites then I would object to any further building within at least 5 mile radius.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7789  Respondent: 15673185 / Simon Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 there is no evidence that the impact of nitrogen and acid deposition on the heathland and the consequent degradation of the heathland has been taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7790  Respondent: 15673185 / Simon Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper cycle lanes on local roads (and the space to provide them). This plan disenfranchises the elderly, the young, the unwell and the disabled.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I object to all sites in West Horsley for over 5 homes. There is insufficient infrastructure planned. It is impossible to deliver sustainable housing sites of this size in the countryside. These sites will merge the villages of Ockham, West and East Horsley creating URBAN SPRAWL.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I endorse in full the comments made by Ockham Parish Council and also those by the Wisley Action Group. I understand that the Richard Harwood QC, retained by OPC and WAG has advised that the Council should not be undertaking a Regulation 19 consultation. I find it insulting that the Council appears not to understand the process under which it is meant to operate.

Additionally, I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. By virtue of its location residents will be reliant on the motor car, any assumption that the infirm, elderly and the young will walk or cycle to work, health facilities, shopping etc is clearly nonsense. I also have no confidence that those who do not fall into the above categories will use sustainable methods to get about. As a medic I am exposed on a daily basis to the sedentary nature of today’s population in the UK and any ambition of converting the population to a bunch of fitness fanatics is very wide of the mark. [see increases in diabetes, heart disease etc]
4. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10)
5. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
6. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
7. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

8. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

9. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

10. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

11. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

12. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.

13. Opportunity (3) should be common to all sites and is not unique to this site.

14. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

15. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

16. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

17. I object to the removal of additional 3.1 ha from the green belt without any justification.

18. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

19. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

20. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

21. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

22. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

23. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

24. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

25. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
26. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

27. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

28. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

29. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

30. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

31. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

32. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

33. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

34. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

35. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

36. 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.

37. I object to the plan period being inconsistent. This is an example (of which there are many) of extremely sloppy work which gives me no confidence in the content. For example, the foreword mentions an end date of 2034 whereas the introduction 1.2 and 1.3 refer to 2033. Spatial vision uses 2033. What is the plan period? This is very unclear.

38. 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.

39. Para 2.13 I reject the statement that most local roads in villages have “at least one footway and usually two “.

40. I reject the assumption in para 2.15 that increased road infrastructure capacity – it may improve theoretical capacity but actually worsens performance.

41. I object to the new green belt provision in Ash and Tongham to prevent the merger with Ash Green and I do not understand why this locality should be treated any differently from any other location for example the merger of Ripley and Ockham as a result of policy A35.

42. I object to the fact that the spatial vision makes no mention of protecting the TBHSPA

43. I reject the comment in the spatial strategy that the RIS will provide congestion relief for the A3 in Guildford as my understanding is that these schemes have been dropped.
44. I do not accept para 3.2 where there is a disconnect in the period of the Council’s Corporate Plan and the Submission plan –

45. I object to Para 4.1.11 which should clearly identify the version of the LAA and not just refer to “the latest”.

46. I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

47. I object to the wording of 4.2.18 which is unenforceable. Throughout the plan the word “Expect” needs to be replaced by “require”.

48. Likewise, I object to the use of the word “resist” in 4.2.24 – it should be replaced by “refused” in this para and throughout the plan.

49. I object to the wording of policy H2 specifically “we will also seek” and “we will seek”. This should be replaced by the use of the verb “require” in this para and throughout the document.

50. Policy H2 para 4 needs to include that any funds paid in lieu of affordable housing should be ringfenced and the wording further tightened by replacement of “expect” by “will enable”.

51. I object to policy H3 para b “the local community”. Rural exception sites should only be allowed where the identified need is truly local defined as within the parish.

52. I object to policy P2 and the inclusion of Ripley in the list of villages to allow insetting.

53. Policy P2 refers to the Metropolitan green belt yet goes on to create additional green belt in the west of the borough furthest from the metropolitan area. There is no justification whatsoever for new green belt land in Ash.

54. There is no evidence that cross-boundary options beyond the green belt have been considered as a viable option instead of moving the green belt boundaries within the borough.

55. I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.

56. I strongly object to policy P5 TBHSPA as no regard whatsoever is paid to the impact of air pollution on the integrity of the heathland and the resultant loss in habitat from nitrogen deposition. It is inconceivable that the level of development proposed in this plan will result in anything other than thousands more vehicles on the roads due to the unsustainable locations of for example policy A35. Additional traffic equals more pollution and more nitrogen deposition. There is no evidence at all of any in-combination impact from planned developments in adjacent boroughs and no regard to the recent Wealden case for example.

57. I also reject that the SAMM mitigation through the use of wardens will have any impact on cat predation.

58. I object to the statistics in para 4.3.55. Any survey work done on the visitor numbers is unlikely to have covered the time when commercial dog walkers from South London who appear in droves throughout the week.

59. I object to para 4.3.57 – there is no evidence that SANG provided adjacent to the SPA will provide any mitigation at all. Faced with the choice of walking in a manmade environment or on the SPA, the majority of people would choose the natural environment.

60. 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.
61. I do not understand why previously developed sites in the green belt have not been included for development. Specifically, HMP Send where the prisoners have been told that they might be moving and indeed the site is understood to have been valued by Savills amongst others. There is no justification for adjustment of green belt boundaries until all other options have been exhausted. Doubtless there are other examples.

62. I object to para 4.4.36 with regard to the extension of the Surrey Research Park. There is no justification for this when there are a number of surface car parks within the Research Park which should be used in preference. The density of buildings in the Research Park needs to be prioritised over an extension in area.

63. 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”. I do not understand what this means so how can I be consulted properly.

64. I object to policy D1. This policy will be unenforceable due to the deletion of the word “must” in para 2. The word “must” needs to be retained.

65. 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.

66. I agree with the insertion of para 4.5.8a 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.

67. I support the inclusion of policy D4.

68. In Guildford borough, it is widely accepted that there is an infrastructure deficit particularly in roads and the provision of health services. The needs of current residents are not taken into account in policy ID1. All infrastructure should be in place before development of strategic sites takes place to ensure that the developer pays so as not to jeopardise the needs of current residents. Indeed, I understand that the withdrawal of the objection from Highways England is contingent on infrastructure in advance.

69. There is insufficient weight given to the problem of air pollution in the borough. I object strongly to the fact that the Council does not take the health of its residents sufficiently seriously to have a policy to ensure the improvement of air quality in the life of the plan.

70. I object to the wording of policy ID3 para 11 which makes no sense at all. What do you mean by “the provision of additional public off-street parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise derive through the Guildford gyratory”.

71. 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.

72. I object to the inclusion of policy A58 – there is no justification for an increase in additional industrial floorspace at this location or indeed particularly as there are a number of vacant industrial sites at o Slyfield.

73. The AECOM work to support the ELNA is a poor piece of work riddled with unsupported assumptions.

74. I continue to object to the inclusion of the following policies: o A36-A41 inclusive in the Horsleys, A43 at Garlick’s Arch, A42 Clockbarn, and A58 There is no evidence that anyone has considered the cumulative impact of these developments together with the development at A35. The infrastructure proposed is totally inadequate and, as these stand at the borough boundary will have a huge impact on residents throughout the borough and further afield, particularly those who use the A3.
75. 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.

76. I object to the fact that the land required at Garlick’s Arch is said to be almost 29ha where only 13ha is required at 30dph.

77. Similarly, I object to the excess requirement for land at A53 where the normal plot ratio of 50% appears to have been ignored resulting in an excess use of green belt land of over 7.5ha.

78. I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.

79. I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

80. The transport evidence provided shows an increase in congestion as a result of the planned developments. Insufficient modelling has been done to satisfy me that any of the strategic sites can move forward on this basis. The consequences are severe to residents of Guildford and those much further afield.

81. I object to the fact that there is no proposed location for a bus station in the town centre. This means it is impossible to model journey times from, for example A35 with any degree of reliability. Furthermore, the modelling capacity at SCC does not use “real world” situations for example the junctions do not allow for traffic stopped at red traffic lights and assume all time all direction running which is clearly a fallacy. This perhaps makes it easier to understand why the today’s congestion is so dire.

82. There is no evidence that noise and light pollution and the impact on both humans and wildlife has been adequately taken into account.

83. I object to the fact that policy S2 makes no distinction between previously developed land in the Green Belt. It is clear that the use of a site with no above ground building e.g. A35 has a far greater impact than the use of a site such as Send Prison.

84. I object to the fact that greenbelt sites are allocated to improve flexibility in the delivery of the plan. It is clear that the green belt should only be seen as a last resort, after all other opportunities have been fully explored.

85. I object to the use of a film on the GBC website promoting a biased view from those interviewed who would in the real world have been excluded due to conflicts of interest. This is unfortunately completed expected behaviour from a council that continues to promote opaque policy and one which has little respect from many residents.

86. I object to the fact that the prosed housing allocation at Slyfield of 1000 homes results in no increase in vehicles. This is a patently false assumption and leads me to question the soundness of the transport evidence base.

87. I object to the variation in the assessment of sites which is extremely inconsistent. In some cases, the TBHSPA appears to be a concern whereas in others it isn’t. The same applies to a number of elements including impact of conservations areas, SNCIs, views in and out etc.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. It is very worrying that the council does not appear to have either the resources or the intellect to get the basics right.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPS16/7795  Respondent: 15673313 / Stephanie Wiera  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heath SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

3

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater treatment capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the infrastructure is in place ahead of occupation of the development. We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

An impact study of the foul network has confirmed that there is not sufficient capacity to accept this development. An option has been included in the report.

Waste water treatment: We have concerns regarding sewage treatment capacity at Ripley STW to accept proposed flows from this development. Ripley STW has a current Population Equivalent of 15,400. It will be necessary for us to undertake upgrades to the works to enable the flows from the new development to be accepted. Programming of upgrades to the STW will be necessary and the developer shall notify Thames Water and the Planning Authority of phasing of development and any amendments thereof.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the strategic site at Wisley Airfield as the proposed plan failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7862  
Respondent: 15678593 / Mole Valley District Council (Deborah Miles)  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Highways

Development at Wisley Airfield would give rise to a significant increase in vehicle movements. The nearest principal road, the A3, and other nearby trunk routes, M25, A317, A319, are all heavily congested. It is therefore likely that traffic will seek to make use of less congested routes, particularly at peak periods, encouraging ‘rat running’ and avoidance activities on the local rural road network to the south of the site, and southern roads such as the A246. Significant additional traffic on these roads would have an adverse effect on land within Mole Valley. MVDC is pleased to note that the requirements section to policy A35 (Land at former Wisley Airfield) has identified a number of works that will need to be done in order to improve the road network. MVDC would also ask that a Traffic Impact Study which includes mitigation measures should be submitted as part of any application.

A number of sites are earmarked for development within and around the edges of West Horlsey, East Horsley and Clandon. As with MVDC, the rural areas around Guildford are heavily constrained and the majority of new development has to be accommodated on smaller sites which makes it difficult to phase development and ensure the provision of infrastructure and services is in line with the rate of building. MVDC would ask that GBC are aware of this as and when applications begin to come forward, especially given the potential impacts identified as the Wisley Airfield development goes forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7863  
Respondent: 15678593 / Mole Valley District Council (Deborah Miles)  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Flooding

The Wisley Airfield site is identified as being partly in Flood Zone 3. MVDC would expect this to be taken into account when assessing a planning application on the site and that any Flood Risk Assessment would take measures to mitigate flooding in the wider area.

Education

MVDC have previously raised concerns that the development of the Wisley Airfield site had the potential to put additional pressures on the need for secondary school places both in GBC and MVDC. Of particular concern was pressure on places at Howard of Effingham School which would result in cross-boundary issues, particularly for residents in Bookham, for whom Howard of Effingham is the most popular local secondary school. Given the above MVDC are pleased to see the allocation of a secondary school within the Wisley Airfield site, as well as a primary school as previously proposed.

The Surrey School Organisation Plan does predict a steady rise in the need for secondary school places in Guildford over the next 10 years. Therefore, MVDC would ask to be kept appraised of the potential for development at this site, and that GBC consults with Surrey County Council so that county wide pressures can be taken into consideration.

Health

The allocation at Wisley Airfield will result in a significant increase in the local population, and it is noted that no specific provision has been made for primary health care. MVDC would expect GBC to consult with both Guildford and Waverley and Surrey Downs CCGs in order to address any cross-boundary issues that may result in a deficit of primary health care places in MVDC, specifically Bookham where the draft NHP has identified an existing need.

It may be beneficial if any consultation on this topic would include NHS England South East Region and that development aligns with the strategic transformation plan as agreed by the Surrey Heartlands Collaboration which includes social care and health.

Waste

The comment in Key Considerations of policy A35 (Land at former Wisley Airfield) regarding the waste allocation in the corner of the site is noted. It would be expected that consultations with Surrey County Council would be carried out regarding the need for alternative locations if required.

Upgrades to Thames Water waste water treatment works were mentioned in the refusal of the original planning application on the site. It would be expected that consultations with Thames Water would continue on this matter and that the upgrades would be carried out in time to support any proposed development and mitigate any impact on provision outside GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Development of over 2,000 house village at Ockham (the former Wisley Airfield)

The proposal at this location of some 2,000 houses with mixed housing, retail, commercial, traveller and school development under two miles away would be significant in itself. To further compound this with proposed extensive developments at Burnt Common (400 houses and commercial developments and Gosden Hill Farm, Burpham 2,000 and mixed used developments) in addition to the impact upon West Horsley of the proposed developments within those Parishes, is more reflective of the form of development one might see in a Stalinist society rather than a caring and listening, democratic society. It also evidences a total lack of real consideration for residents within the districts concerned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7991  Respondent: 15694113 / Claire Netherton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In looking at what residents can do to object, it considers that it would be best for residents to focus on objecting to the inclusion of development of the Former Wisley Airfield and it has drafted some bullet points for residents to use as below. It is important to state an objection whenever that is appropriate.

Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

Any proposed secondary schooling would add additional congestion.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7992  Respondent: 15694465 / Ellie Denham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
New Settlement at Ockham

I strongly object to the proposal to use farm and previously requisitioned land at Ockham for 2,100 houses. This is important Green Belt Land. The impact on my village would be enormous and unsustainable. Planning permission has recently been refused for numerous reasons and the site should therefore be removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8011  Respondent: 15698753 / Anna Calvert  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to site A35 Wisley Airfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8036  Respondent: 15703937 / Graham Vickery  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Already Rejected Proposals. I object to the GBC rejecting plans to develop the former Wisley airfield due to among many things a breech of national regulations as to the levels of nitrogen dioxide and particulates in the environment, and yet now includes this site in the Draft Local Plan. Utterly disingenuous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8120  Respondent: 15706689 / Hope Sarti  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In line with Central Government guidance I OBJECT to development on areas of high agricultural value. This includes Wisley airfield. If it is necessary to build on agricultural land it should be of low quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8126  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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 A35 Wisley airfield in the local plan. The principle of the local plan is a presumption in favour of sustainable development. The Housing and Planning Act 2016 grants permission in principle to any development included within the local plan leaving only technical details to be considered by planning authorities. The site at Wisley failed in its planning application on a large number of points including infrastructure and sustainability. It is highly unlikely that these will be met in the future due to its positioning. Part of the site is green belt and no exceptional circumstances have been demonstrated. Aspects of the site also include high quality agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8079  Respondent: 15710433 / Simon Hester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to A35, development near our nations royal NHS garden would ruin its setting in a site preserved for historic interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8215  Respondent: 15725185 / Jackie McKenna  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8216  Respondent: 15725185 / Jackie McKenna  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- 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.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of
GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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>PSLPS16/7757</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td><a href="#">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.</a></td>
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<td>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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<td>Attached documents:</td>
<td><a href="#">Highways England letter 18 July 2016 - Representation to consultation.pdf</a> (7.7 MB)</td>
<td><a href="#">Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf</a> (1.2 MB)</td>
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<td>POLICY A35: LAND AT FORMER WISLEY AIRFIELD, OCKHAM</td>
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<td>POLICY A43: LAND AT GARLICKS ARCH, SEND MARSH/BURNT COMMON AND RIPLEY</td>
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<tr>
<td>POLICY A43A: LAND FOR NEW NORTH FACING SLIP ROADS TO/FROM A3 AT SEND MARSH/BURNT COMMON</td>
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<td>POLICY A58: LAND AROUND BURNT COMMON WAREHOUSE, LONDON ROAD, SEND.</td>
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<td>APPENDIX C INFRASTRUCTURE SCHEDULE</td>
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<td>TRANSPORT TOPIC PAPER, PARAGRAPH 5.56</td>
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The requirements section of Policy A35 newly proposes that additional mitigation is required for the Wisley Airfield development in the form of “two new slip roads at A247 Clandon Road (Burnt Common)”. The Transport Topic Paper paragraph 5.56 notes that the new slip roads are being promoted to “mitigate the impact of the level of strategic planned
growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley Airfield site (site allocation Policy A35).

As noted in our letter dated 5 October 2016, it remains unclear if these slip road proposals are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in Policy A43 (and now additionally Policy A58 and A35) are dependent on GBC’s aspirations set out in A43a. Appendix C Infrastructure Schedule notes that the Burnt Common slip road scheme will be wholly developer funded. To date we do not have any evidence that such an improvement is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges. We would welcome further discussions on these policies.

We understand that the Wisley Airfield site is expected to go to Planning Appeal in September 2017 which will likely have implications for the soundness of these policies, therefore discussions are urgent if proposals are reliant upon the improvement set out in A43A that is being promoted by GBC and Surrey County Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley. Previous objections therefore still stand for this changed policy concerning the reinclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham).

Following a huge public outcry, Guildford Planning Committee unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.
2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
5. Absence of adequate traffic data.
6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/4554  **Respondent:** 15922337 / Andrew Malcher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/8308  **Respondent:** 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**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?**

**Attached documents:**
Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), OPC OBJECTS to the inclusion of that site in the 2013 draft Local Plan for development. OPC and others in relation to, inter alia, the GBC’s 2013 draft Local Plan and Planning Applications for development or use of FWA/TFM, have documented in, inter alia, OPC’s letters to GBC dated 25 November 2013 (Local Plan), 4 June 2014 (Local Plan), 22 September 2014 (Planning Application), and 19 April 2016 (Local Plan). By way of example, copies of OPC’s letters of 22 September 2014, 29 March

OPC’s objections include, in summary:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.
2. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of a new settlement of over 2000 dwellings at FWA/TFM was after 14 months decisively and unanimously rejected by GBC on 8 April 2016 following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

• was an inappropriate development within the Green Belt;
• would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of in the Green Belt Framework;
• failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction on the Green Belt Framework);
• was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
• would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the local road network;
• failed to deliver the required transport sustainability measures;
• failed to secure an appropriate provision of affordable housing;
• was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
• would result in loss of the safeguarded waste site;
• presented a dense and urban form of development owing to its quantum and scale;
• had an adverse impact on the setting and significance of a designated heritage asset;
• had an unacceptable air quality impact;
• impacted on education infrastructure;
• impacted on policing infrastructure;
• impacted on health infrastructure;
• impacted on library provision.

1. Both similar and other objections and concerns had been raised by OPC, neighbouring borough and parish councils, Surrey University of Surrey, Thames Water, NATS, the Environment Agency, Police Authorities, Highways Authorities, residents associations and individuals - both in the context of the planning application and in relation to the current and earlier GBC draft Local Plans.
2. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt. There are no exceptional or very special circumstances justifying removal of the site from the Green Belt or its development. To the contrary there are overwhelming reasons for retaining the site as Green Belt, not only for the benefit of Ockham and surrounding villages, but also the wider community.
3. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath Special Protection Area, etc.
4. The value of FWA/TFM as a community asset and as a vital “lungs”, not least because of the dangers and possible illegality of increasing pollution and decreasing air quality as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding areas.
5. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.
6. The total unacceptability and disproportionality of the threat posed to Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, many Conservation Areas and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased over 15 times.
7. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of the population, as evidenced in the existing Ockham Parish Plan and the emerging Lovelace Neighbourhood Plan.
8. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road infrastructure (cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are
9. “The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land (of which 45.4ha is classified as best and most versatile land – Grade 2 and Grade 3a).”

10. The fallacious nature of claims made that FWA/TFM should be regarded as “brownfield” or previously developed. It should also be noted that the former airfield hardstanding and part of the old runway are within the 0-400m exclusion zone of the SPA, and the remainder of the old runway is (of course) flat where any development would have a major impact on the openness of the area. Much evidence exists that the adverse consequences of development of the site, including damage to the ecology of, e.g., the SPA, cannot be mitigated. The impossibility in practical terms of creating a sustainable development on FWA/TFM which is further demonstrated by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development plan despite numerous attempts over an extended period.

11. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and the Horsleys, and the impact on the future development plans of the RHS at Wisley.

CONCLUSION

The above objections graphically demonstrate why FWA/TFM was and should remain in and be part of the Green Belt, and why the lack of infrastructure, from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make the site totally unsuitable for any kind of significant development – as OPC and others have consistently argued.

The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development and amounts to disregard for widespread local and further afield opinion.

The repeated attempts in numerous guises over the last 3 years to take FWA/TFM out of the Green Belt and to press for both major and ancillary development of the site have imposed heavy and unwarranted costs and burdens on local communities, not least Ockham Parish, have caused a blight on the area, distress to local residents and farming businesses, and have adversely prejudiced peoples’ lives and livelihoods.

OPC therefore strongly OBJECTS to this further and unwarranted attempt to exclude FWA/TFM and other parts of Ockham Parish from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Ockham Parish Council - 12 July 2016.doc (46 KB)
OCHHAM PARISH COUNCIL Local Plan Supplementary Letter - 14 July 2016.docx (26 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is further from railway stations than any other identified strategic site.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
3. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
7. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
8. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
9. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
10. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
11. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
12. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
14. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
15. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
16. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
17. I object to the extension of the plan period by 1 year as it has not been identified as a major change
18. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
19. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
20. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
21. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
22. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
23. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The policy associated with the allocation of the site for 2,000 houses has not significantly changed (beyond minor grammatical issues). However, the Wisley allocation refers to a bespoke SANG to mitigate rather than avoid adverse effects on the SPA, this wording is inconsistent when comparing the general policy within the Plan (P5) and this specific policy. Policy A35 is not setting out the correct tests, and is inconsistent with Policy P5’s approach which seeks to adequately to avoid impacts on the SPA via a properly located and designed SANG. From our understanding of the proposals that have currently been brought forward, we do not consider that the SANG is adequately designed to avoid adverse impacts on the SPA, in particular because the extant rights of way on the site are likely to funnel residents from the housing and into the SPA. The RSPB therefore still remains concerned that policy P5 has not been properly implemented in relation to this specific allocation, a concern detailed in our response to the ‘Proposed Submission Local Plan: strategy and sites’ consultation.

The RSPB note with concern that all 8 of the “reasonable spatial strategy alternatives” considered by the Plan’s Sustainability Appraisal contain a proposal for 2000 houses at Wisley (page 36). The RSPB does not consider that this represents an appropriate consideration of alternative strategies insofar as this policy is concerned. This approach makes it impossible to consider the comparative sustainability of the site against other possible strategies. This has an important bearing on the overall soundness of the Plan. Paragraph 182 of the National Planning Policy Framework requires that for a plan to be justified it “should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”. We consider that the failure to consider any plan scenario which does not contain Allocation A35 fails to satisfy the requirements of this test: there are clearly alternative sites and approaches that could have been adopted (highlighted by the number of sites that the Council has considered throughout the production of the Plan) but the Council has ultimately declined to demonstrate a clear need for the Wisley airfield site. If the Council had presented scenarios here with and without the Wisley airfield site it would have been possible to consider the comparative merits of the alternative sites and approaches, but instead the Council has considered no alternatives for such a substantial proportion (16.1%) of the Council’s housing allocations, and one that will have an array of significant implications arising from its inclusion in the Plan. The RSPB consider that in order to make the Plan sound it is essential that it assesses alternative scenarios which do not include the Wisley airfield site.

A further important consideration is that if technical problems prevent the delivery of the Wisley airfield site the Council does not have an alternative solution to help it meet its housing requirements, raising questions about whether the plan is effective over its period.

The RSPB considers that there are inherent inconsistencies between the stated aims of the Plan and the inclusion of the former Wisley airfield which are central to the overall soundness of the Plan. The Foreword to the Plan states that:

“It also outlines how we will conserve and enhance the unique qualities of our natural and built environment, especially in the Surrey Hills Area of Outstanding Natural Beauty and Thames Basin Heaths Special Protection Area. This Development Plan Document sets out how we propose to meet these conflicting demands” (p5).

The Foreword continues:

“Whilst we will conserve and enhance our special landscapes, the Local Plan aims to balance protecting the borough’s unique environment with meeting our social and economic needs.”

The RSPB submits that this statement gives a clear expectation that protection will be accorded a higher priority than development in circumstances where there are conflicts between the need to provide housing and the need to protect nature conservation interests. A key factor is that existing protected areas must be conserved in situ, whereas there is greater flexibility to decide where future housing allocations will go.

The RSPB notes Strategic Objective 6 of the Plan: “To protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural..."
Beauty for their biodiversity and landscape characteristics.” In addition we note Strategic Objective 7: “To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates and is adapted for, climate change.” All of Strategic Objective 6, and the first part of Strategic Objective 7, are pertinent to the proposed allocation of the former Wisley airfield. The RSPB consider that the inclusion of the former Wisley airfield represents a clear failure by the Council to meet its requirement to conserve its internationally designated areas and has placed development demands first, and is a failure to meet the strategic objectives it has set itself. These clear internal inconsistencies demonstrate that the Plan is not the most appropriate when considered against reasonable alternatives and that the Plan consequently fails the “justified” test of Soundness.

The RSPB notes that policy S1, Presumption in favour of sustainable development, states:

“We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental considerations in the area.”

However, this does not mean that it will be possible to find appropriate solutions to allow the development to go ahead.

We note that the supporting Policy P2, Green Belt, states that “If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.” (para 4.3.14). However, a visit to the former Wisley airfield clearly indicates that, aside from a runway and adjoining apron that the site is clearly open in character, a fact borne out that the first reason given by the Planning Officer’s report into the Wisley application recommended refusal for the “clear and substantial detrimental impact on the openness of the Green Belt” (Officers’ Report, para 2.1).

The RSPB’s concerns with the site

We highlight here the key concerns which we raised on the rejected planning application for the former Wisley airfield, that we consider are central to the inclusion of the site as an allocation in the Local Plan. We focus on concerns we raised about the general suitability of the site, as we consider that these are so fundamental to the site that they cannot be resolved by the promotion of an alternative development scheme on the site.

6 The RSPB highlighted that “the location of the SANG between the development and the SPA will actually draw people towards the SPA and would end up simply providing new residents with a route to the SPA. Clearly, this defeats the object of providing a SANG.” (RSPB objection letter, 25 March 2015)

We further stated:

“Whilst we understand the developer’s desire to locate the SANG in the 400m zone as built development is highly unlikely to be permitted we consider that the constraints this has on its design is likely to introduce pinch-points and compromise the SANG’s effectiveness.” (RSPB objection letter, 25 March 2015)

Finally the RSPB stated:

“The RSPB’s view is that the existing PROW [Public Rights of Way] fundamentally and unavoidably compromise the functionality of the SANG as an avoidance measure.” (RSPB objection letter, 12 February 2016)

It is important to note that as a result of the multiple rights of way run right across the whole development site and into the SPA, providing ready access to the SPA to residents of any housing scheme that is constructed on this site, it is our view that no housing allocation is appropriate in this location.

As set out above in relation to our concerns about the rejected scheme, we do not consider it likely that a project level assessment will be able to adequately exclude the risk of harm to the Special Protection Area, as we do not believe a SANG at this development site can be effective in drawing residents away from the SPA as a result of the Public rights of way network on the site. As this information is already known and was available to the authors of the HRA we consider it inappropriate to rely upon such an approach here – the issues of concern are ones which are not capable of being resolved at the application level. Part of the role of the HRA of the Plan should be to evaluate the likelihood that a project-level assessment can be passed – helping to give a clear understanding of the likely deliverability of key sites: the former Wisley airfield is expected to deliver 16.1% of the Borough’s overall housing until 2034 – so it is essential that any risks to such a site coming forward should be clearly evaluated.
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   a) The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

   b) The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

   c) The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

   d) The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

   e) The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on
the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f) The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
When I went to school we had up to 40 people per class….and I see that the developers have planned for 6 classes (I assume a form is a class as it was in my day). OK – so where are the other 680 students going to school? Remember they are across 12 age groups so we are talking which is something like 24 further forms/classes required.

Has anyone at GBC really thought this through?

We can then turn our attention to the flora and fauna of the area. In the woodland known as the Forest alongside the Drift in East Horsley SWT have ripped out an area of low trees and thicket that surrounded a rather hidden pond. There used to be rabbits there, wrens, blue tits, black caps, tree creepers, wood-peckers as well as all the other birds of the woodland….but they are all gone. Who will care if SWT does not care?

And so what will happen to all the flora and fauna of the Wisley Airfield….an area that has largely remained quiet and untouched since the war….I plead on their behalf….“Where will we go?”

So what about this development – caged in by the A3, a B road and a couple of lanes. There is no infrastructure. Roads, Sewers, no parking at the two local train stations, buses….well, they may put some routes in but they will be clogged up too. In addition the permanent white noise of the A3 and the M25….and yet another area of open space is sucked up!

And lets face it….who will snap up these houses?

They will be sold in the main to people who are escaping London, but still work in the city….they will not be for local people who cannot afford a deposit….but still need a decent home.

I think that GBC needs to throw-out all the PR companies and Consultants, who will sell you the concept that black is white. I know this is true because all my business life I have used these type of people to sell the impossible for me. Get rid of them.

Start again GBC – with the whole of your local plan and start using your individual intelligence.

Blue-Sky thinking is what you need…it is not Rocket Science…it's easy….all you have to do is speak up, forget kow-towing to your boss because you are frightened of loosing your pension, speak up, speak load and talk some sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SITE A35, FORMER WISLEY AIRFIELD

A new size of 95.9 hectares has been proposed without any consideration for local transport and will cause a huge increase in the local traffic which is already too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We strongly oppose the proposed development of the former Wisley Airfield. There are so many problems with this proposal that it is difficult to provide a comprehensive letter of objection.

In summary this is a proposal that, if approved, would place an unacceptable strain on an already overburdened infrastructure, whether schooling, medical facilities, roads, railways, parking and water supplies.

We are in the middle of another drought and the pressure on the water supply infrastructure is intense. The development is also unacceptably close to a prized national asset, the RHS Garden at Wisley. The M25 and A3 are already close to gridlock, as shown by the standstill on both 13 and 14 July.

The ameliorating proposals put forward by the developer in an adjacent planning application are ludicrously inadequate.

Please remove this proposal from the 4th document.

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 see there is another planning piece that has gone in and I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons as outlined below.

Please why can't you just allow a few more family homes in this peaceful family area, why this insistence on trying to create a massive new village that will ruin the infrastructure and all we hold dear in this beautiful area we live in? My 20 points are:-

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is total unrealistic
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

• The associated traffic increase from the RHS has not been taken into account.
• The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account. It is a nightmare getting anywhere in these days as you know.
1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis. My children have been injured just by current local traffic on their bikes and refuse to cycle now as just too dangerous.
2. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
3. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
4. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design
5. Opportunity (3) should be common to all sites and is not unique to this site
6. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting.
7. I object to the removal of additional 3.1 ha from the green belt without any justification

1. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
2. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
3. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
4. I object to the extension of the plan period by 1 year as it has not been identified as a major change
5. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

1. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616?

This last point is one of a number of glaring examples of why the plan is unsound and not fit for purpose and alongside my other points needs to be rejected.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2124  Respondent: 17299841 / David Chesters  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is too much area allocated for retail which could be better used for residential.

I object to the loss of more green belt with the increased area.

I object to the increased area making it adjacent to Upton farm.

It is adjacent to a3/m25 junction which would lead to traffic using Wisley roundabout into an already congested and dangerous entry to the m25 slip road.

Local roads roads would not cope with increased traffic and buses in the narrow roads.

I object to the plan for the above reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2200  Respondent: 17301377 / Amanda Obrien  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The new draft remains objectionable for three main reasons:

1. Based on Guildford Borough Council’s own figures, marginal changes such as these would still leave 56.7% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.

2. The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.

3. No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend. It would not be difficult (e.g. with the help of the draft West Horsley Neighbourhood Plan) to set out a proper, more integrated vision for this part of the borough. Without this, the plan is not a plan for the Horsleys in any practical sense.
The Inspector will also want to have regard to the feeling among Horsley residents that this limited approach is deliberate – driven by a concealed wish to turn their community into new dormitory town. Plausible claims have been made of political bias by a Council leadership representing the western end of the borough, which is less threatened by London urban sprawl.

The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents. The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.

The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route.

These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.9

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>pslp172/2298</th>
<th>Respondent:</th>
<th>17303617 / Peter Warburton</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for the following reasons:

1. I live in East Horsley where local roads would not be able to take the additional traffic from Three Farms Meadow.
2. The infrastructure in East Horsley, including doctor, railway station and parking, would be overloaded by the additional pressure from the habitants of Three Farms Meadow.
3. It would involve severe disruption and constraints on the roads in Ockham.
4. I object to the removal of additional 3.1 ha from the green belt
5. I object to the change in green belt boundary to the eastern end of the site
6. I object to the fact that the council has failed to remove this site from the local plan
7. I object to the inclusion of a 10% buffer in the housing number over the plan period.
8. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

1. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2498  Respondent: 17316033 / Anne Morris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Site A35 Former Wisley airfield

The sheer volume of traffic which will be using Ripley High Street and local roads notably Newark Lane, will cause massive congestion and pollution. I cannot envisage any possible traffic management methods which would effectively and efficiently deal with this volume of traffic on our narrow local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2599  Respondent: 17325665 / Claire Nix  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account. The regular events at the RHS attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills Area of National Beauty will increase the negative impact of the views.

I object to the removal of additional 3.1 ha from the green belt without any justification

I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000s of objection from local residents and statutory consultees.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly to reflect the views and concerns of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As well as the general points above and notwithstanding any ruling upon them I also object to the inclusion of TFM in the draft local plan - even or especially as it is now amended and even if the further amendments now proposed by the developer can be considered at this stage. My reasons include:

1. TFM is the least sustainable strategic site identified in both this and previous versions of the plan because of the constraints on the site and the physical location.
2. TFM is further from railway stations than any other possible strategic site – hardly a place to locate students or other residents of publically owned or rent subsidised homes.
3. TFM relies upon the most congested stretch of the strategic road network in the county and the most congested motorway junction in the country (J10).
4. All roads local to TFM are at capacity and there are no funds to expand these e.g. by providing new bypasses.
5. The proposal to provide a bus service to TFM is totally unrealistic and unsafe. The roads are inadequate etc. This is clearly a sop to try and get permission - the bus will never materialise or will be cancelled for low use soon after its inception.
6. TFM is next to the most popular visitor attraction in the south-east, the RHS at Wisley, where visitor numbers are booming. These are forecast to increase by over 500,000/annum in the planning period yet this has not been taken into account. The RHS’s very popular special events attract thousands more visitors several times a year and these already bring the traffic all around to a standstill. Any future residents of TFM would be virtually prisoners.
7. There is no employment available near TFM so its residents will have to commute to work (or to the university to study!).
8. The proposed development at TFM cannot be built in any event or at least for many more than five years as a) it would breach the height restrictions imposed by the Ockham DVOR/DME (that will remain throughout the plan period) and b) there is no sewage capacity. Ergo this site anyway cannot contribute to any five year land supply calculation.
9. Even the councils own (changed) “Opportunities” listed in their policy reinforce why TFM is totally inappropriate. It takes barely a fleeting look at the plans for this site (a very long urban terrace perched on top of a ridge) to see these are just totally wrong.
10. The TFM site as this now defined (3.1Ha larger than was the subject of a recent planning application that the council unanimously rejected!) a) now abuts another heritage asset, Upton Farm, negatively impacting the setting of this building, b) will greatly damage the Surrey Hills AONB by its disfiguring views, c) encloses an area of high archaeological impact and d) proposes building on the flood plain. The site plans do not even accurately show the proposed site boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3114  Respondent: 17344801 / Graham Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally the proposed development on the Wisley Airfield would I think put just as much strain on the area as the Garlick?s Arch plan. Particularly the increase in traffic and impact on local facilities. It would obviously put major pressure on the small back roads into Cobham which I believe would make those small roads extremely dangerous. An increase in traffic through Ripley would cause massive congestion not seen since before the Ripley By-Pass was built - yes I am old enough to remember those times - with again an increase in air pollution and a decrease in air quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for the following reasons:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the overcrowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

- The associated traffic increase from the RHS has not been taken into account.
- The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

1. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
2. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
3. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
4. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
5. Opportunity (3) should be common to all sites and is not unique to this site.
6. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
7. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
8. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
9. I object to the removal of additional 3.1 ha from the green belt without any justification.
10. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
11. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
12. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

14. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

15. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

16. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

17. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

18. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

20. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

21. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

22. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

23. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

24. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

25. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

26. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

27. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- The proposed removal of over 3 hectares of Green Belt has been included without justification.

- The significant modifications made to the plan mean that it should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

- The evidence base especially the West Surrey SHMA and the Guildford addendum 2017 has been challenged by other experts including NMSS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3059  Respondent: 17382305 / Brian Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The new requirements set out in para. 9 of the infrastructure section for site A35 show how inadequate and unsuitable this site is and highlight the basic flaws in this proposal. Its proximity to the Thames Basin Heaths Special Protection Area and its scale will in reality be environmentally damaging despite the placebo of a SANG. The residents of such a site will all need at least one car per household, they will very largely have to commute to work and the proposals for alternative transport are not realistic. The proposals for local shops, school and medical centre will not materialise until late in the project and will no doubt be subject to the uncertain availability of funds at that time. In the meantime the development will place an unacceptable burden on the already stretched infrastructure of surrounding communities. In particular it is highly questionable whether the proposed bus service will prove economically viable and it will in any case be unsuitable for the narrow local roads. There is nothing sustainable about this proposal and it continues to be folly to build such a car dependent site next to two already overloaded main roads, the M25 and the A3 whose problems are acknowledged elsewhere in the plan (para 2.14a)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3378  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY A35 - Former Wisley airfield, Ockham

4.40 The concerns around highways impact as set out against policy A26 remain the same for this site. GVG is more concerned that the size of site, at 2,000 units, is not big enough to support the proposed community in its own right. GVG believes the development of this site will lead to substantial pressure on the existing infrastructure, both locally and in Guildford town centre, and this is not currently mitigated under the proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As previously set out, I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site because of the constraints on the site and the physical location.
2. Too far from railway stations.
3. Limited footpaths and safe walking or cycling routes.
4. Located next to and close to very congested motorway M25 and A road A3 which are frequently at grid lock throughout the day.
5. Local roads and back roads are not safe alternatives to blocked motorways and are very busy normally which has lead to consistent accidents due to dangerous black spots (Black Swan junction).
6. Train services already to congested and limited parking.
7. Local roads not safe for bus services, cars, cycles and walking commuters. Unrealistic.
8. RHS Wisley is near to this site and during shows causes increased traffic congestion and incidents.
9. Limited employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. I object to the negative impact to heritage sites.
11. remove this site from the local plan.
12. I object to this development because it will not improve the dangerously high pollution levels in this area.
13. I object because the plans includes a new road for the Elm Corner residents which involves having to navigate our way through the new development particularly when there is a better alternative for the residents available to the Council.
14. I object to the proposed Submission Local Plan.
15. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
16. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
17. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
18. I object to the extension of the plan period by 1 year as it has not been identified as a major change
19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
20. I object to the Council wasting tax payers and residents’ time and money by not following due process and ignoring previous representations.
21. I object to the 10% buffer in the housing number over the plan period.
22. I object to the evidence base which is not transparent and has been challenged.
23. I object to the transport evidence base including the Highways assessment report.
24. I object to the transport assessment which used prescribed vehicle movements from this site with no justification.
25. I object to the housing number, particularly as the Council have not, as required used any constraints such as green belt, infrastructure, air quality. I believe that the housing number is unsound and unnecessary as housing shortage is not in Surrey but in inner London where low paid workers need to live to be near to their work.
26. I object to the apparent disregard the damage caused by nitrogen deposition and high pollution levels.
27. I object to policy S2 because the figures in the AHT table do not add up.
28. I object to the quantity of space allocated for retail in the town centre.
29. I object because the schooling offered is inadequate for this area both pre-school, primary, Junior and High school. Not enough thought has been given to the future need.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3386  **Respondent:** 17408481 / Colin Brewer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is further from railway stations than any other identified strategic site.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
3. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3390  **Respondent:** 17408481 / Colin Brewer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is further from railway stations than any other identified strategic site.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
3. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
- The evidence base is unsound, out of date and inconsistent. Particularly the SHMA, (2017 Guildford Update), the ELNA, the SHAR, the Green Belt and Countryside Study, and the Air Quality review.

- there is no comprehensive list of the evidence base making it impossible to know what the Council relies upon.
- it is littered with basic errors, including simple mathematical errors.
- the drafting is weak and unenforceable.
- there is no justification for including TFM (site A35) due to sustainability, air quality, impact on the TBHSPA, green belt, infrastructure cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Due to the rural location and constraints of the site it is the least sustainable strategy site in this and previous versions of the plan. Its inclusion cannot be justified in any way due to:

1) Local roads and railway stations being at capacity

2) Being adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10)

3) The increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House, negatively impacting the setting of these buildings and the wider Ockham Conservation Area

4) The increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB

5) The change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

6) The removal of additional 3.1 ha from the green belt without any justification

7) The failure of the council to remove this site from the local plan despite receiving 1000's of objection from local residents and statutory consultees.

8) The major changes made to the plan mean that this should not be a Regulation 19 Consultation. This type of consultation needs to be on the totality of the plan rather than the proposed changes.

9) There is no clear justification for the removal of one strategic site over site A35.

10) The plan is unsound within the original time frame and the council have chosen not to address this. They have ignored previous representations and not followed due process.

11) The transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

12) The housing number is unsound and open to legal challenge. The Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

13) The council claim this plan protects the borough's most important countryside, landscapes and heritage. It most certainly DOES NOT.

It is very apparent that the council have not taken on board many of the comments made previously on issues such as poor drafting and errors. When a comparison of the allocated sites is made there is clearly extremely inconsistent weighting on the various restrictions to suit their ends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I continue to object to the inclusion of the Land at Wisley Airfield (A35) in the draft Local Plan for many reasons, including:

1. It is further from railway stations than any other identified strategic sites.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to the most congested junction in the country (J10).
3. Local roads are at capacity particularly when the SRN is not free-flowing.
4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs. It is unrealistic to suggest sustainable methods of travel such as cycling and walking could be used.
6. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
7. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

Despite having received thousands of objections from both local residents and statutory consultees, the council has failed to remove this site from the Local Plan and yet other sites have been removed. I can see no clear justification for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3579  Respondent: 17417633 / Claire Attard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to OBJECT once again to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan. I have already sent in my objections on previous occasions and would like you to pass on these comments together with all my previous comments to the Inspector. There are numerous errors in the plan and it has a considerable lack of clarity.

Below, I have highlighted some of the major objections I have as to why I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan:

1) I object, unreservedly, to the increased area of the site as this now backs on to our house, UPTON FARM, which is one of the heritage sites in Ockham, and would have a HUGE impact on our outlook and views all around. Not to mention the noise pollution, environmental impact, and loss to our quality of life. We have spent years adhering to the stringent Heritage Rules to make sure this house is in keeping with its period and history.

2) I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

3) Local roads are at full capacity and often grid-locked in the rush hours, particularly when the weather is bad, when taking the children to the local school.

4) It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10).

5) The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”!
6) The change to the site boundaries are not identified correctly on the plan (Appendix H p16) - I object to this.

7) I object to para 21 which “limits” development in flood zone 2 and 3. Development should be EXCLUDED in flood zone 2 and 3.

8) I object to the fact that the council has failed to remove this site from the local plan, despite receiving 1000’s of objections from local residents and statutory consultants.

9) I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

10) I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

11) I object to the Council wasting tax payers and residents’ time and money not following due process and also ignoring previous representations over the years.

12) I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

For all the above reasons, and numerous other reasons, I consider this plan is unsound and should be removed from the plan as soon as possible.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3615  **Respondent:** 17419649 / Fiona Angus  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing again to the council to object to the inclusion of A35 Three Farms Meadows in the draft local plan.

I object for the following reasons:

1 it is next to one of the most congested rounds in the country and will result in the area being gridlocked with traffic and an unacceptable deterioration in traffic issues in the village of Ripley. Many of the residents would use their cars to travel to work or drive to Woking result in serious issues in Ripley Newark lane.

2 it is also opposite Wisley garden which is a very popular visitor attraction. They are proposing to increase visitor numbers by 500,000 which in combination with this proposed development will result in the entire area becoming gridlocked.

3 I object that the council has not removed this development from the plan. This overdevelopment on green belt has been repeatedly turned down and the council has received thousands of objections from residents. The high number of houses is totally unsound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
12. Opportunity (3) should be common to all sites and is not unique to this site.
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
16. I object to the removal of additional 3.1 ha from the green belt without any justification.
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. 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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. Indeed, in ordinary words and common language, I believe that this draft local plan, and these revisions, in totality, but in particular relating to Three Farm Meadows are “bonkers”!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3643  Respondent: 17424065 / Hugh Grear  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ⊗ The associated traffic increase from the RHS has not been taken into account.
The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

12. Opportunity (3) should be common to all sites and is not unique to this site

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

16. I object to the removal of additional 3.1 ha from the green belt without any justification

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.
I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. Indeed, in ordinary words and common language, I believe that this draft local plan, and these revisions, in totality, but in particular relating to Three Farm Meadows are “bonkers”!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/3647</th>
<th>Respondent:</th>
<th>17424161 / Georgia Pask</th>
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I have already objected to the proposed development at Three Farm Meadows. I am now contacting you to object to the proposed changes to the Guildford Borough Council Local Plan as it affects that site (policy A35). The submission plan is, in my view, unclear, unreliable and unsound and contains a significant number of errors. In particular, I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

In my view, the significant modifications being made to the plan mean that it is inappropriate to have a regulation 19 consultation – I note that no clear explanation has been provided by the council as to why it considers it to be appropriate. In addition, the Council appears to be wasting tax payers money and residents time and money as a result of not flowing due process and ignoring previous representations.

I remain opposed to the inclusion of Three Farms Meadow (A35) in the draft Local plan for the reasons set out in my email last year. I would reiterate that Three Farm Meadows is a Green Belt Site of more than 60% agricultural land alongside meadows which are natural habitat for badgers, bats and protected species. It is also a site of Natural Conservation Interest and home to three species of RPB ‘red list’ birds which are on the ‘at risk’ register. There can be no doubt that the proposed development would significantly change air quality for the worse.

Please ensure that this email, together with my original comments on the proposed development are passed on to the relevant inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposal to increase the area to 95.9 hectares because:

The building of what is virtually a New Town will result in a volume of traffic which will gridlock our already overcrowded local roads and raise the pollution levels which are already above safe limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object once again (3rd Time) to any development of the site referenced above for the following reasons:

a) It will generate over 4000 traffic movements a day. I presume Guildford Council reads the daily news reports that the rest of the World is trying to reduce pollution and protect an already damaged environment? This development will create traffic, noise and pollution precisely through its location, and this is totally unacceptable in the World today.

b) It will require additional schools, medical facilities and policing to support the community, which cannot even be adequately provided in the local area at present, so why create more demand through this development, when there are no funds for the existing local Authority services?

c) The site is Green Belt and should not be developed on, and the roads are already congested and cannot support any increased traffic (The A3 and the M25 are permanently jammed with traffic). Furthermore, there are no funds to maintain the roads if they are built, and some of the surrounding Councils cannot even repair the existing roads.

d) When this application was originally proposed we didn't have Brexit which apparently inter alia is expected to reduce EU immigration. If we no longer have so many people coming into the UK every year, there presumably won't be a short term pressing need to build as many houses, and even less of a reason to destroy the countryside to build the additional housing as proposed in this application.

Hopefully the application will finally be rejected so we don't waste further time and money on this, when there are so many more important issues like providing better education in the schools, reducing class sizes, and investing in our teaching, medical and policing staff.

I believe the Planning process needs reforming so that the environment can be protected for the long term and against short-term development. Perhaps the Government should also bring in Development Land Tax which most European Countries already successfully apply.

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? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is not a sustainable strategic site because of the constraints on the site and the physical location.

2. It is further from railway stations than any other identified strategic site.

3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10) and as such, the local roads are at capacity.

4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded roads and will therefore be unreliable and subject to frequent delays.

5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum and the associated traffic increase from the RHS has not been taken into account. Also the regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

7. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

8. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

9. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

10. I object to the removal of additional 3.1 ha from the green belt without any justification

11. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

12. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

14. I object to the fact that there is no clear justification for the removal of one strategic site over site A35 and I also object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

15. I object to the extension of the plan period by 1 year as it has not been identified as a major change

16. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
19. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

20. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

21. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

22. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/5422  Respondent: 17424993 / Harvey Weller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is not a sustainable strategic site because of the constraints on the site and the physical location.

2. It is further from railway stations than any other identified strategic site.

3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10) and as such, the local roads are at capacity.

4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded roads and will therefore be unreliable and subject to frequent delays.

5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum and the associated traffic increase from the RHS has not been taken into account. Also the regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

7. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

8. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

9. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
10. I object to the removal of additional 3.1 ha from the green belt without any justification.

11. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

12. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

14. I object to the fact that there is no clear justification for the removal of one strategic site over site A35 and I also object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

15. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

16. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

19. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

20. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

21. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

22. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
2. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
3. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3737  Respondent: 17425729 / Tony Forrest  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to comment on the proposed changes to the above Plan.

Despite what I imagine must be thousands of objection letters to Three Farm Meadows being included as a Strategic Site reviewing the documentation I see that it still listed as a potential site for inclusion.

I know my wife’s concern for this area being considered is from a traffic perspective and inability for the area to sustain this volume of development, to which I wholeheartedly agree but my other concern is that of the green belt, or rather loss of it. There appears to be changes to the green belt boundaries with no justification and which do not appear to have been identified correctly on the Plan. (Appendix H page 16). There is no justification given for the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact. We will also have increased negative impact of the views of the Areas of Outstanding Natural Beauty.

I am aware that this consultation is supposed to be comments just on the changes to the Plan not a reiteration of initial concerns but just in case my strength of feeling is lost – I object strongly to the Three Farm Meadows area, A35, being included on this Plan - our infrastructure does not support it and the unsupported estimated housing needs figures and associated building are threatening to destroy areas of green belt and views unnecessarily.

I appreciate it is tax payers money which is used to further delve into figures, predictive housing number needs etc but I am sure that we are local residents want this to happen. I am sure further investigation and analysis of the surrounding road and railway networks alone are warranted before this can area can ever be included.

As you have asked for our opinion please do listen to our concerns and incorporate them in your planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3778  Respondent: 17426977 / Sam Attard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I would like to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan. There are numerous errors in the plan and it has a considerable lack of clarity.

I have written some of the major flaws and my objections in the inclusion of policy A35, Three Farms Meadows in the draft Local Plan.

- Local roads are at full capacity and often grid-locked in the rush hours, particularly when the weather is bad, when taking the children to the local school.

- I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

- The change to the site boundaries are not identified correctly on the plan (Appendix H p16) - I object to this.

- I object, unreservedly, to the increased area of the site as this now backs on to our house, UPTON FARM, which is one of the heritage sites in Ockham, and would have a HUGE impact on our outlook and views all around. Not to mention the noise pollution, environmental impact, and loss to our quality of life. We have spent years adhering to the stringent Heritage Rules to make sure this house is in keeping with its period and history.

- I object to para 21 which “limits” development in flood zone 2 and 3. Development should be EXCLUDED in flood zone 2 and 3.

- The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”!

- I object to the fact that the council has failed to remove this site from the local plan, despite receiving 1000’s of objections from local residents and statutory consultants.

- It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10)

- I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

- I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

- I object to the Council wasting tax payers and residents’ time and money not following due process and also ignoring previous representations over the years.

- I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

For all the above reasons, and numerous other major and minor reasons, I believe this proposal is unsound and should be removed from the plan as soon as possible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to confirm my continued objection to the inclusion of A35, Three Farm Meadows in the draft Local Plan for the reasons as given below:

- It is the least sustainable site in both this and previous versions of the plan because of the constraints on the site and the physical location.
- It is further away from any railway stations than any other identified strategic site.
- It is adjacent to one of the most congested stretches of strategic road network in the country (ie M25 Junction 10)
- Local road are already at capacity particularly when there have been any incidents thus making the SRN not free flowing.
- Public transport is already having to negotiate the overcrowded SRN and is therefore unreliable and subject to frequent delays.
- It is also adjacent to one of the most popular visitor attractions in the south-east, the RHS at Wisley which attracts huge numbers. Any regular events which take place several times per year already result in extra traffic chaos and I feel this has certainly not been taken into account.
- There is insufficient employment available on site so that all residents will have to travel to work. It is unrealistic to assume that people will walk/cycle on narrow local road on a regular basis. As a long term cyclist I have ceased riding due to the dangers of other road users.
- I also object to any changes within the green belt boundaries.
- I also object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultants.
- I wonder and object to the fact that there has been no clear explanation why the council think it appropriate to have a regulation 19 consultation when the changes are major and needs to be based on the totality of the plan rather than the proposed changes.
- I object to the inclusion of A35 as it will not contribute to the 5 year housing projection due to constraints notably in the provision of sewage capacity
- I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
- I object to a 10% inclusion buffer in the housing number over the plan period as it totally unnecessary.
- I object to the transport evidence base including the SHAR 2016 Highways assessment report which has already been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
- I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
- I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBSPA etc. I believe that the housing number is unsound and open to legal challenge.
- I object to the apparent disregard for the impact of in-combination development on the THSPA, particularly damage caused by nitrogen deposition and high pollution levels.
- I object to the differences in the housing figures set out in the Annual Housing Target table. Another glaring example of why the plan is not sound.
- I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I also object to the reliance of the Carter Jonas study update 2017 which includes “demand” for retail space from companies that are already in administration.

I consider the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3835</th>
<th>Respondent: 17432929 / Andrew Jackson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to object in the strongest possible terms to the plans submitted for reconsideration this September, following the rejection last year of the plan to develop the former Wisley Airfield at Three Farm Meadows. Any development in this area is unwarranted and will seriously damage the locality.

Please ensure that the existing concerns of all the local residents to this plan are conveyed to the Inspectors and that they are aware of the volume of objections against this development which cannot proceed to spoil this local area.

The application was rejected by GBC on hood ground last year when TFM should have been removed from the Local Plan. It is wrong to bring it back for consideration when it was turned down on so many grounds and for very good reasons.

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ▪ The associated traffic increase from the RHS has not been taken into account.
   ▪ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. 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.

36. Guildford Borough Council should not be entertaining any proposals from a Cayman Islands registered company. These types of entity are often associated with financial crime and tax evasion. In effect, Guildford Borough Council will be out of step with UK Government policy to not have any dealings with non-transparent entities, if this application proceeds.

Please consider all of the above and ensure that plans for an enormous town in the most inappropriate location are again refused. There are many other parcels of land around that can be considered for housing which would not impact on a small community in this way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3855  Respondent: 17433409 / Julie Iles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development. There is insufficient infrastructure to provide for the traffic and there is an insufficiency of sustainable transport links. The proposed mitigation is totally inadequate to avoid excessive traffic on the existing country lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I have the following objections to the proposed development at Three Farms Meadows, Wisley, and to the Guildford Borough Council Local Plan. Please confirm that all of these comments together with all my previous comments have been passed to the Inspector.

1. I object to the inclusion of Three Farms Meadows in the draft Local Plan for a number of reasons including:
   - It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
   - It is further from railway stations than any other identified strategic site.
   - It is close to one the most congested junction in the country (M25 Junction 10).
   - Local roads are at capacity particularly when the SRN is not free-flowing.
   - Any public transport (bus) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs.
   - It is adjacent to the most popular visitor attraction in the south-east, RHS Wisley, where visitor numbers are increasing every year.
   - There is insufficient employment available locally so that almost all residents will have to travel to work.

2. I object that the increased area, being on the south of the site facing the Surrey Hills AONB, will increase the negative impact of the views from the AONB.

3. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

4. I object to the fact that the Council has failed to remove this site from the local plan despite thousands of objections from local residents and statutory consultees.

5. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

6. I object to the extension of the plan period by one year as it has not been identified as a major change.

7. I object to the inclusion of a 10% buffer in the housing number over the plan period as unnecessary.

8. I object to the housing number and I believe that the housing number is poorly based and open to legal challenge.

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 object to the Council wasting the time and money of tax payers and local residents by not following due process and ignoring previous representations. I consider, for the reasons listed above, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Wisley Airfield and fields lie adjacent to the A3/M25 junction which is a pollution hotspot in Surrey (CPRE) and until air quality at this junction can be brought within legal levels, then proposing the addition of a village and two schools next to the junction seems highly irresponsible and possibly illegal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

- It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
- It is further from railway stations than any other identified strategic site.
- It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
- Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
- Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
- Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
- It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
- The associated traffic increase from the RHS has not been taken into account.
• The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
• There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
• The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
• It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
• The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
• Opportunity (3) should be common to all sites and is not unique to this site
• I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
• I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
• I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
• I object to the removal of additional 3.1 ha from the green belt without any justification
• I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
• I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
• I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
• I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
• I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
• I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
• I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
• I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
• I object to the extension of the plan period by 1 year as it has not been identified as a major change
• I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
• I object to the Council wasting tax payers and residents' time and money not following due process and indeed ignoring previous representations.
• I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
• I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
• I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
• I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
• I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
• I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
• I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
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.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4099  Respondent: 17454433 / Landowners Consortium Wisley (Sir or Madam)  Agent: CBRE (jonathan stoddart)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )


CBRE Ltd and Strutt and Parker act on behalf of a consortium of landowners who, between them, legally own the land identified within the appended location plan – see Appendix 1. The landowners that make up the consortium include: the Harris’ (Land at Bridge End Farm); the Matthews’ (Land at 2 Yew Tree Cottages); and the Fieldings (Land at Little Upton). Within these representations, we refer to this consortium of landowners as the ‘Client’.

Our Client’s land comprises predominantly agricultural fields, with agricultural buildings and dwellings. It extends to approximately 20 hectares in area and is located between Ockham Lane and the former Wisley Airfield.

This letter sets out the relevant background to this consultation, and our Client’s representations in response to the Proposed Submission Local Plan: strategy and sites’ (2017) consultation.

Background

Our Client’s land falls within the strategic allocation for the Former Wisley Airfield (Policy A35).

The principle of introducing a new settlement at Wisley Airfield initially emerged through the preparation of Guildford Borough Council’s (‘GBC’) evidence base: Green Belt and Countryside Study, Volume V (April 2014). Since then, strategic allocation A35 has been developed as part of the preparation of the Local Plan. The planning preparation process and associated evolution of strategic allocation A35 is summarised below.

The landowners who make up the consortium we currently represent have independently submitted representations to previous consultations in the plan making process. These representations are included at Appendix 2.

Regulation 18: Draft Local Plan Strategy and Sites document (2014)

In the summer of 2014, GBC consulted on the Draft Local Plan Strategy and Sites document. This document included a draft site allocation for a new settlement at the Former Wisley Airfield (Policy A35).

The land allocated extended to 69ha in area and was related to the Airfield land only – see map at Appendix 3. The Thames Basin Heath Special Protection Area (‘SPA’) Exclusion Zone (within 400m of the SPA) was excluded from the allocation as this land is not considered to be appropriate for new residential development. The land owned by our Client was also not included within the allocation at this time.
The draft site allocation proposed up to 2,100 homes, which is equivalent to 30 dwellings per hectare (dph) when applied to the proposed site area of 69ha. The application of a 30dph housing density is consistent with the methodology used within GBC’s evidence base.


In the summer of 2016, GBC consulted on the Proposed Submission Local Plan: Strategy and Sites document. This version of the plan also included a draft site allocation for a new settlement at the Former Wisley Airfield (Policy A35).

However, in this revision, the site allocation area included additional land to the south of the airfield as this had been confirmed as available by the relevant landowners, some of whom we represent currently. The total site area, which is illustrated in Appendix 4, is 92.8ha.

The total number of homes proposed remained at 2,100 within Policy A35, despite the additional land included within the allocation boundary. The resulting housing density is equivalent to 23dph, lower than the 30dph proposed in the 2014 version of the allocation and used within GBC’s evidence base methodology.


The latest version of the Local Plan is the subject of this consultation response. Like the versions before it, the 2017 plan includes a strategic allocation for a new settlement at the Former Wisley Airfield (Policy A35).

Since previous versions, the boundaries of site allocation A35 have been extended further to include the Land at Little Upton Cottages which is owned by the Fieldings and forms part of the consortium we now represent. The proposed site allocation now comprises 95.9ha in area and the revised boundaries are shown on the associated map provided at Appendix 5.

Despite the increased size of the site allocation area, the quantum of development proposed remains similar to earlier versions of the plan – i.e. “approximately 2000” conventional homes (Class C3). The resulting housing density provides fewer than 21dph, which is considerably lower than the 30dph proposed in the 2014 version of the allocation and used within GBC’s evidence base methodology.

On behalf of our Client, who as mentioned comprises a consortium of landowners to the south of the Former Wisley Airfield, our response to this revision of the plan is set out below.

**Wisley Airfield Outline Planning Application**

Outline planning permission for development of a new settlement at the site of the former Wisley Airfield (see Appendix 6 for a site plan) was refused by GBC on 8 April 2016 (LPA ref. 15/P/00012). Refusal was predominantly on the grounds of inability to demonstrate very special circumstances to outweigh harm to the Green Belt, a policy test which will not apply should the proposed allocation in the emerging Local Plan be adopted. This planning application sought permission for up to 2,068 residential dwellings, up to 60 sheltered accommodation units, retail, leisure and commercial uses as well as other supporting infrastructure.

The applicant has since lodged an appeal against the decision to refuse the application (PINS ref. APP/Y3615/W/16/3159894) which has been recovered by the Secretary of State. If the Secretary of State determines that the appeal should be allowed, then permission will effectively be obtained for the full extent of residential and other development set out within Policy A35 as currently drafted, but on only part of the land allocated for the development of the new settlement. Under the current bespoke programme the inquiry will take place in September 2017.

**Representations**

**Context**

The National Planning Policy Framework (‘NPPF’) sets out the tests against which Local Plans should be prepared and assessed. Local Plan policies should follow the approach of the presumption in favour of sustainable development.
The principal test guiding policy adoption is that of ‘soundness’, namely that the plan should be (NPPF paragraph 182):

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on crossboundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

It is against these categories that the emerging Local Plan has been reviewed and against which the following representations have been made.

Principle of Strategic Allocation A35

As mentioned in previous representations, our Client fully supports the proposed release of the land identified by Policy A35 from the Green Belt, and the associated proposals to promote the creation of a new settlement on this land.

Extent of Strategic Allocation A35 Boundary

Our Client supports the extension of the strategic allocation boundary to include the land shown on the map at Appendix 1. The proposed boundary more closely reflects the scale of land identified and assessed within the supporting evidence base for the Local Plan, and (in line with paragraph 85 of the NPPF) also utilises physical and permanent features to create a defensible Green Belt boundary.

Delivery of the New Settlement Proposed in Strategic Allocation A35

As currently worded Policy A35 does not seek to impose specific phasing requirements for the delivery of the site, and instead states that GBC will have regard to the “delivery and timing of the key infrastructure requirements on which the delivery of the plan depends”. Our Client supports this approach, as it allows for flexibility in the phasing and delivery of new development where it is appropriately serviced and does not seek to impose delivery and phasing requirements which might otherwise serve to limit or frustrate delivery on the site.

It is worth noting that the land owned by our Client has alternative access, via Hatch Lane, which does not rely on the access routes created by the Wisley Airfield outline planning application. This access arrangement may assist with the early delivery of new development, particularly housing, which is a core objective of the Government’s Housing White Paper (2017). Notwithstanding the fact that the allocated land is served by several access points, we encourage increased connectivity through the new settlement, including links between the Wisley Airfield site and our Client’s land.

Quantum of Housing Proposed within Strategic Allocation A35

As detailed out in the ‘Background’ section, through the evolution of the plan the boundaries of strategic allocation A35 have been extended, and as a result the size of the site has increased significantly from 69ha to 95.9ha. This represents a circa 40% increase on the initial site area. As set out above, our Client supports the inclusion of this additional area as it is reflective of the Local Plan evidence base and addresses the Green Belt boundary principles set out in the NPPF.

This 40% increase in area however has not been reflected in the proposed quantum of development to be provided at the site in relation to housing, other uses and infrastructure. The current version of the allocation proposes “approximately 2,000” Class C3 homes, which is fewer than the 2,100 homes proposed when the allocation was initially introduced in 2014. If the quantum of housing was to increase by the same proportion as the site area, then circa 2,940 homes would be proposed (at 30dph). Whilst it may not be necessary to specify this number within the allocation wording, it is clear that the current reference to “approximately 2,000” homes is not appropriate as it does not respond to the additional capacity which the additional strategic allocation land could provide. Instead we suggest that the allocation wording is revised to
reflect the potential to deliver a greater quantum of development to reflect the additional land. It is considered that a range of residential yield should be identified, such as “…in the region of 2,000-2,500 dwellings…”.

The revised wording would then reflect the fact that the land allocated to the south of the airfield site is capable of delivering a high number of new homes, with Wisley Airfield potentially delivering circa 2000 homes as part of the pending planning appeal. Clearly the exact number of homes should be determined through proper masterplanning of the site, and the allocation wording could be further adapted to capture this.

In our Client’s view, the above identified key considerations would suggest that draft Policy A35 as currently worded does not accurately reflect provisions of the NPPF and the opportunity for sustainable development. Our Client suggests that greater flexibility is introduced to draft Policy A35 to allow for a more significant contribution of development, particularly in relation to residential dwellings, with specific reference to a higher number.

For the reasons set out above, our Client considers that Policy A35 of the Proposed Submission Local Plan as currently drafted is unsound with respect to development capacity as it is not:

- ‘Positively prepared’ – Additional development brought through the strategic allocation would further assist in meeting the development needs of GBC and neighbouring authorities. The development potential has not been maximised bearing in mind the significant uplift (40%) in land being promoted, and particularly when there is scope for the Wisley Airfield appeal to meet the current draft allocation for 2,000 units alone;
- 'Justified' – As it is not the most appropriate strategy with consideration to the principles of the evidence base and inappropriate reliance on the scope of the outline planning application and planning appeal;
- ‘Effective’ – The allocation currently fails to maximise the opportunities to deliver development provided by the release of Green Belt land, and therefore does not make the most efficient use of land, and so would not positively contribute to addressing cross-boundary strategic housing priorities; and
- ‘Consistent with National Policy’ – As it could do more to “boost significantly the supply of housing” (paragraph 47) and promote sustainable development.

Conclusion

The proposed extension of the strategic allocation boundary to include our Client’s land is supported as it reflects GBC’s evidence base and addresses the Green Belt boundary principles set out in the NPPF. Also supported is the exclusion of specific phasing and sequencing requirements, as this could frustrate the delivery of the new settlement.

Our Client does not however support the proposal to provide “approximately 2,000” homes as set out in the Spatial Vision (p22) and in Policy A35 (p225), as we do not believe that GBC has positively addressed the additional land (circa 27ha) which has been included since the allocation was introduced in 2014.

In order to be found sound we request that the Local Authority amend Policy A35 to state that the site can accommodate, “in the region of 2,000-2,500 homes”. Policy A35 (1) should therefore read:

This is a residential lead mixed use development, allocated for:
(1) In the region of 2,000 – 2,500 homes (C3), including some specialist housing and self-build plots, and;
The exact number can then be determined through proper masterplanning of the site.

I trust that the above provides informative comments to the current consultation. I would be grateful if you could please confirm safe receipt of these representation and for above comments to be considered and included in the final version of the emerging Local Plan.

In addition, we request to be kept informed on the Examination proceedings and request to reserve the ability to take part in the Examination Hearings on behalf of our Client.

[Appendices in attachment]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ’unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.
8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
9. Opportunity (3) should be common to all sites and is not unique to this site.
10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
12. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
13. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
14. It is further from railway stations than any other identified strategic site.
15. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
16. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
17. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
18. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
19. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
20. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
21. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”.
22. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.
23. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
24. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
25. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
26. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
27. I object to the Council wasting taxpayers' time and money not following due process and in particular ignoring previous representations.
28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
29. I object to the Housing number which is unsound and open to legal challenge.
30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 17454753 / Henry Ashby</th>
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<td>, is Sound?</td>
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</table>

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of Policy A35, Three Farms Meadows, in the draft Local Plan for many reasons including:

1. I object to the increased area of the site as this now abuts and overlooks another heritage asset, Upton Farm, negatively impacting the setting of this building and the Ockham Conservation Area.
2. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will adversely impact the views from the AONB.
3. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
4. It is the least sustainable strategic site in this plan because of the constraints on the site and the physical location.
5. It is too far from railway stations.
6. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10).
7. Local roads are at capacity particularly when the A3 is not free-flowing (accidents, diversions, roadworks etc).
8. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
9. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

10. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 per annum.
   ◦ The associated traffic increase from the RHS has not been taken into account, and
   ◦ The regular events at the RHS, which attract 1000’s more visitors several times a year, and the resultant traffic has not been taken into account

11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

12. It remains unclear when/if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

13. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding rural area.

15. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.

16. I object to the Proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

17. I object to the Council wasting taxpayers and residents’ time and money not following due process and indeed ignoring previous representations.

18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

20. I object to the transport evidence base which has been criticised for using out of date modelling software and is therefore unreliable.

21. I object to the housing number which I believe is unsound.

I consider for the reasons listed above and other reasons, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (M25/J10).

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc). The frequent accidents at the Black Swan crossroads demonstrates the danger of relying on local roads. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

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The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.

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I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.

I object to the Housing number which is unsound and open to legal challenge.

I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

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27. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.
28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
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For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object strongly to the inclusion of Three Farm Meadows in the Draft Local Plan for a number of reasons.

1. It is very much part of the Green Belt and I object to the change of the Green Belt Boundary to the Eastern End of the site.
2. I object to the fact there has been no clear explanation as to why the council think its appropriate to have a regulation 19 consultation when the changes are major.
3. The location of the build is totally unsuitable and unsafe, the site is extremely close to the most congested road network (A3 and M25) and most congested M25 junction of all (junction 10).
4. It is also adjacent to RHS Wisley where a huge number of visitors which will increase by 500,000 per annum, which will then entail more traffic leading off the A3 or onto the M25 slip road.
5. Any added public transport will have to face the crowded SRN and this would result in serious delays and unreliable services. The station car park already struggles with the amount of cars and the site is furtherest from the station than any other strategic site.
6. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is totally unnecessary.
7. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Consecrations Area.

These are just some of the huge number of reasons why this site should not be included in the Local Plan, I have objected so many times and yet the Council are still failing to remove the Three Farm Meadows Site from the Local Plan. I hope you finally take in what all the local residents have been trying to say and realise what a huge effect this will have on the beautiful, historic and peaceful village of Ockham. You are destroying a piece of History.

Please please please remove this site from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I. WAG objects to the fact that there has been no clear explanation from the Council as to why they think it is appropriate to have a regulation 19 consultation when the changes made are major, for example the removal of a strategic site and a reduction in the housing number.

II. WAG also objects to the fact that there is no clear explanation why the Plan period has changed particularly as this has not been either justified or clearly identified.

III. WAG objects to the Council wasting tax payers’ and residents’ time and money not following due process and indeed ignoring previous representations.

WAG notes that the quality of evidence remains poor and is in some cases out of date and in most cases inconsistent. For example:

IV. WAG objects to the fact that there is no comprehensive list of the evidence base. See below:

[see attachment for image]

It is incumbent on the Council to ensure that the evidence base is readily accessible and completely transparent. WAG is of the opinion that the evidence is neither easily accessible nor transparent.

V. WAG objects to the use of the West Surrey SHMA and the Guildford addendum 2017 as these documents are based on false premises (inflated student number for example) and notes that the review by the independent expert Neil McDonald on behalf of the Guildford Residents’ Association questions the soundness of the SHMA. (Appendix 2)

V. WAG also objects to the transport evidence bases including the SHAR 2016 Highways assessment report which has been criticised by Mouchel, amongst many others for using out of date software and it is therefore unreliable.

VI. WAG continues to object to the use of the highly inconsistent Green Belt and Countryside Study and its numerous addenda as this document is subjective, misleading and inconsistent and therefore unreliable.

VII. WAG objects to the ELNA and in particular the Carter Jonas study update 2017 which includes “demand” for retails space from companies in administration.

With regard to the policies in the plan WAG makes the following comments:

VIII. WAG objects to the inclusion of a 10% buffer in the housing number over the plan period as we are advised by counsel that this is unnecessary.

IX. WAG objects to the housing number and in particular the fact that the Council have not, as required, used any constraints such as green belt, infrastructure, AONB, air quality, TBHSPA etc. WAG believes that the housing number is open to legal challenge.

X. WAG objects 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.

XI. WAG objects to the calculations used for industrial space which appear to use a far lower ratio than the industry standard resulting in unnecessary land take which has an impact on the use of green belt land.

XII. WAG objects generally to the poor drafting and apparent lack of proof-reading. An example of this is policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” when in fact the figures in the table add up to 9,810. It is impossible for members of the public to understand this kind of error/lack of clarity.

XIII. WAG objects to the fact that a number of policies use words such as “seek” and “request” which would render the policies unenforceable. All of these weasel words should be replaced without exception with strong verbs such as “require” and “demand”.


XIV. WAG objects to the apparent disregard for the impact of air pollution on residents of the borough and considers that the evidence submitted on air quality is not only woefully inadequate but also misleading.

XV. WAG objects to the fact that no account appears to have been taken on the impact of pollution on the TBHSPA particularly the damage caused by nitrogen deposition. It is an undeniable fact that the level of growth proposed by this plan will result in increased traffic movements and by extension increased polluting emissions. Any argument that relies on potential changes to the make-up of the vehicle fleet in terms of fuel source is clearly premature.

XVI. WAG objects to the fact that there is no consideration of the impact of in-combination development on the TBHSPA especially the large proposed developments in neighbouring authorities.

XVII. WAG objects to the fact that there is no justification for the removal of the strategic site at Normandy over and above the removal of any other strategic site and in particular site A35 on many grounds but most notably on sustainability grounds.

In relation to the specific allocation of site A35, WAG has a number of objections as outlined below:

a. WAG objects to the inclusion of site A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of infrastructure and in particularly the sewerage constraint due to lack of any spare capacity at Ripley sewage works.

b. WAG objects to the fact that the Council appear to have directed that the transport assessment for site A35 uses prescribed vehicle movements from site with no justification. WAG believes this makes the transport evidence subject to challenge due to bias on behalf of the Council.

c. WAG objects to the inclusion of site A35 as it is the least sustainable site identified in both this version and previous versions of the plan because of the constraints of the site and the physical location which is adjacent to the TBHSPA.

d. WAG objects to this site due to the fact that it is further from the railway stations than any other strategic site and in fact further from the railway than any other site in the borough save for the land between Seale and Shackleford

e. WAG objects to the inclusion of site A35 in spite of unanimous rejection of planning application 15/P/00012 on 14 grounds.

f. WAG objects to the inclusion of site due to the fact that it is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10). The SRN in this location is currently operating significantly over-capacity and the proposed improvements both uncertain in design and timescale.

g. WAG objects to the fact that the withdrawal of the objection from Highways England dated 5th October 2016 almost certainly does not take into account the approval granted to the RHS Wisley on 5th October 2016 which has a significant impact on traffic. The assertion that RHS traffic does not impact the peak hour traffic is clearly false as day visitors leave the Gardens during the afternoon peak as any local resident will confirm.

h. WAG objects to the inclusion of site A35 due to the fact that the local road network is also at capacity and is severely adversely affected when the SRN is not free-flowing at times of accidents, diversion, roadworks etc.

i. WAG objects to the allegation that public transport provision will be able to mitigate the impact of this allocation especially as bus routes to/from Guildford will have to utilise the over-crowded SRN in one/both directions and therefore will be unreliable and subject to frequent delays.

j. WAG objects to the inclusion of site A35 due to the fact that any public transport (bus services) provision to Horsley and/or Effingham junction will impact the safety of the local road network as the lanes are not legally wide enough to accommodate PSVs, particularly when sustainable methods of travel such as cycling and walking are being promoted on the same lanes at the same time. This is not only unrealistic but it is also unsafe.

k. WAG objects to the allocation of site A35 due to the fact that the mitigation to address the impact of increased traffic will not address the commuters travelling to Woking station.
l. WAG objects that due to the fact that site A35 is adjacent to the most popular tourist attraction in the south-east, the RHS at Wisley where the visitor numbers are due to increase by 500,000 visitors per annum and that the associated traffic increase has not been properly modelled or taken into account; and

m. WAG objects to the fact that nor has any account been taken of the traffic resulting from the regular events at the RHS which attract 1000’s more visitors several times a year in the consideration of the allocation of site A35.

n. WAG objects to the fact that the inclusion of site A35 has not properly taken into account the impact of the changed boundaries of the allocation on the adjoining heritage assets and in particular the impact on the setting of Bridge End House (Grade II) and Upton Farm (Grade II) in addition to the known impact on Yarne and also impact the setting of the Ockham conservation area.

o. WAG objects to the fact that the increased allocation at site A35, being on the south of the site facing the Surrey Hill AONB will further negatively impact the views to and from the AONB.

p. WAG objects to the removal of an additional 3.1ha of land from the green belt without any justification.

q. Furthermore, WAG objects to change of the site boundaries of allocation A35 as these are not identified clearly or correctly on the plan (Appendix H p16)

r. WAG objects to the unjustified change in the green belt boundary at the eastern end of the site especially as this now encloses an area of high archaeological interest which will prove difficult to develop in the light of the archaeological finds in the surrounding area.

s. WAG objects to the fact that the impact of the OCK/DVOR has not been properly taken into account in the allocation of site A35. It remains unclear when/if this will be decommissioned as the timetable has already slipped. The constraints on the site due to the DVOR are significant and if it is not decommissioned will severely limit the availability of the site to deliver enough land to make the allocation viable.

t. WAG objects to the fact that insufficient weight has been given to the sustainability of allocation A35 due to the lack of employment available onsite meaning that almost all residents will have to travel to work. As already identified above it is unrealistic and unsafe to assume people will walk/cycle to work on narrow unlit local roads on anything more than a very occasional basis.

u. WAG notes that the changes in the opportunities listed in site allocation A35 reinforce why this site is totally inappropriate, talking of “good urban design” – just what is needed in a rural area.

We also include for completeness Appendices damage to the TBHSPA (Appendix 3), relating to Air quality (Appendix 4) and ecology (Appendix 5). Whilst these appendices have been prepared for the forthcoming appeal on a planning application to all intents and purposes the same as site allocation A35 they are all relevant and need to be taken into account.

For all the reasons already identified by the Wisley Action Group together with the reasons listed above it is quite clear that site allocation A35 is unsustainable.

The Wisley Group continues to have very serious concerns on the soundness of the evidence base and objects in the strongest of terms on the proposed submission plan.

....

A further change which flows from the 2017 changes therefore to delete the former Wisley Airfield allocation. Since it must be accepted by the Council that its 2016 housing requirement is unsound and that too much housing was allocated in that draft, the question is, even on the Council’s figures, what changes should be made to reduce the supply. Given the harm identified by our 2016 representations, the former Wisley Airfield should be deleted to reflect the reduced requirement. Instead the changes propose to remove sites which are more sustainable and more easily developed. All references to development at the former Wisley Airfield, including in the proposed changes, should be deleted. The case for that scheme is further diminished by its failure to contribute to the five year housing land supply. The 2017 Land Availability Assessment Addendum projects the first units coming forward in 2022/23.
The changes fail to take into account developments which have been approved or are proposed since the submission draft, in particular the RHS Wisley consent and Highways England’s plans for the M25 junction 10.

**A35 Former Wisley Airfield**

This policy should be deleted for the reasons given above.

In respect of the proposed changes:

At paragraph (21), development should be excluded in flood zones 2 and 3, it should not merely be limited.

At paragraph (22), there should be sensitive design at the proposed built up area boundaries, rather than at the site boundaries. The site boundary to the north is quite separate to the edge of the proposed village because of the proposed SANGs. A significant gap between site boundary and built development is also likely to the south. Sensitive design at the site boundaries is not what is needed, the effects of the development on its surroundings will be from the built area.

The changes to the opportunities to refer to ‘good urban design’ and ‘high quality architecture’ which should be sought on any urban site. It does draw attention to the harmful nature of the proposals which are for a high density urban form of development, including buildings of up to five storeys, rather than a village.

The 2017 proposed changes contain an enlargement of the allocation site boundary to include three further fields to the south east of the development. The A35 section of the 2017 document does not however show this as a change: it is only apparent when the 2016 and 2017 plans are compared or when the appendices are examined. It brings further development close to the Ockham conservation area. There is no discernible justification for this further increase in the development area. Additionally a further alteration to the Green Belt boundary is proposed, removing land at the Ockham Lane/Old Lane junction. This is wholly unjustified and there are no exceptional circumstances for making the change.

The proposed reductions in the housing land requirement and supply do not go far enough whilst the extension of the plan period is not justified. The changes do however strengthen the reasons for deleting the former Wisley Airfield site in its entirety.

We agree that the housing requirement in the 2016 plan was too high, however the reduction in the 2017 proposed changes (from 693 to 654 dwellings per annum) is insufficient.

There is no justification for moving the end date of the plan back by a year. The 2016 plan was not unsound because of its duration. The only reasons which there may be for the change are to increase the housing requirement (by adding a year) and to delay the delivery of new housing (by proposing 850 houses, so above the annual requirement) in that final year (see para 4.1.9). This goes towards a solution for Guildford’s housing needs of strategic sites which may take a long time to come forward (such as Wisley) rather than promoting smaller, sustainable sites within the urban area which are able to provide homes much sooner.

Whilst the buffer over the plan period has been reduced to 10% from 14%, it is still unnecessary. The only requirement for a buffer is for the five year housing land supply and that draws forward housing from within the plan period. There is no justification for any buffer over the plan period.

WAG commented in its 2016 representations that the over-allocation of housing meant that there was no justification for including the former Wisley Airfield (A35) given the harm it would cause. That case is strengthened by the reduction in the housing requirement.

A further change which flows from the 2017 changes therefore to delete the former Wisley Airfield allocation. Since it must be accepted by the Council that its 2016 housing requirement is unsound and that too much housing was allocated in that draft, the question is, even on the Council’s figures, what changes should be made to reduce the supply. Given the harm identified by our 2016 representations, the former Wisley Airfield should be deleted to reflect the reduced requirement. Instead the changes propose to remove sites which are more sustainable and more easily developed. All references to development at the former Wisley Airfield, including in the proposed changes, should be deleted. The case
for that scheme is further diminished by its failure to contribute to the five year housing land supply. The 2017 Land Availability Assessment Addendum projects the first units coming forward in 2022/23.

The changes fail to take into account developments which have been approved or are proposed since the submission draft, in particular the RHS Wisley consent and Highways England’s plans for the M25 junction 10.

(Please Refer to Uploaded Rep)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  
- [Appendix 2 - Review of GL Hearn's Guildford Addendum to the West Surrey SHMA Final.pdf](#) (1.2 MB)  
- [Appendix 1 - Local Plan proposed changes representations.pdf](#) (284 KB)  
- [Appendix 3 - RSPB SoC.pdf](#) (8.0 MB)  
- [Appendix 4 - AQ.pdf](#) (124 KB)  
- [Appendix 5 Appendix 1 - NECR210.pdf](#) (2.8 MB)  
- [Appendix 5 Appendix 2 .pdf](#) (1.8 MB)  
- [Appendix 5 Appendix 3 - Relevant Extracts from Habitats Regulations.pdf](#) (2.2 MB)  
- [Appendix 5 - 807.01 Proof Andrew Baker draft 1.docx](#) (779 KB)  
- [Wisley Action Group_final_response_to_Reg_19_consultation.pdf](#) (166 KB)

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**Comment ID:** pslp172/4172  **Respondent:** 17459585 / Elaine Harvey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I particularly object to the inclusion of the large scale development of Three Farms Meadows which has already been unanimously rejected by Guildford Borough Council in recent months. Where we live such a development would create unnecessary damage to the environment and in conjunction with the approved development at RHS Wisley, would put an impossible strain on local infrastructure in particular, the narrow congested and already dangerous country lanes around the site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/4187  **Respondent:** 17462145 / John Maycock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I continue to object to the inclusion of policy A35, Three Farms Meadows, in the draft Local Plan. Much of the above general comment in relation to the Horsleys is also applicable to this site. Primarily, the proposal removes 3.1 h of land from the Green Belt without any justification. There are no special reasons for this as such for it is effectively unsustainable because of its location and the constraints of the site. Junction 10 of the M25 is unworkable at times and even the proposed improvement of the junction will not alter the totally restricted access to this site from the A3/M25. In this respect, it is will rely at that end on the same junction on the A3 as RHS Wisley, a major visitor attraction with its own plans for expansion. The access at the other end of the A35 site is from narrow country lanes and any substantial increase in traffic including bus services there will make them even more dangerous than they are now and increase the deterrent effect on walking/cycling to the various railway stations. I could also mention problems with drainage, flooding, insufficient sewerage, lack of medical services, schools, transport connections in the surrounding areas as well.

Quite apart from the wholly unsustainable nature of the site on all levels, any substantial development of it, such as that presently proposed and under appeal, will have an overwhelming effect on the Horsleys and other nearby villages, already faced with proposals for their own expansion in the draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
9. The identified mitigation to address the impact of increased traffic will not address commuters travelling to Woking rail station.

10. It is uncertain when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

14. The increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

16. I object to the removal of additional 3.1 ha from the green belt without any justification.

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which "limits" development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000s of objection from statutory consultees and local residents.

For the reasons listed above and numerous other reasons cited by Ripley Action Group, Wisley Action Group, Horsley Countryside Preservation Society all of whom I fully support, this plan is unsound and not fit for purpose.

I urge you to amend the draft plan taking the above concerns fully into consideration, including removal of the former Wisley Airfield from 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: pslp172/4840  Respondent: 17484449 / Thames Water Utilities Ltd (Sir or Madam)  Agent: Savills (Richard Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site Name</th>
<th>Water Response</th>
<th>Waste Response</th>
</tr>
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<tbody>
<tr>
<td>38014</td>
<td>A35 - Land at the former Wisley airfield</td>
<td>This site falls outside of Thames Water’s supply boundary.</td>
<td>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and...</td>
</tr>
</tbody>
</table>
build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint, the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 1713.