Guildford borough Submission
Local Plan: strategy and sites

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

December 2017

Document 12 of 12

Sections covered
Question 1 - The evidence base and submission documents
Question 2 - Legal Compliance
Question 3 - Soundness
Question 4 - Duty to cooperate
Question 5 (2016) - The examination
Question 6 (2016) and question 5 (2017) – The content of the plan
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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Question 1 - The evidence base and submission documents
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

**Question 1 (2016):** Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**Question 1 (2017):** With regard to the proposed changes to the plan and evidence produced or updated since 18 July 2016, do you agree that the evidence used for the Proposed Submission Local Plan: strategy and sites (2017) is adequate, up-to-date and relevant?

**Comment ID:** SQLP16/2059  **Respondent:** 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:**

**GRA Comment:** Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates housing need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

**Strategic Housing Market Assessment**

The “objectively assessed need” figure of **693 homes a year is too high.**

A professional review by NMSS (see Appendix 1) has concluded that, even basing the calculations on a period of stronger economic and student growth, **the housing need figure should be revised down to 510 homes a year.** It also advises the SHMA method should be changed to consider student housing need separately due to the distorting effect of students on the overall Objectively Assessed Need (OAN) forecast.

The current SHMA inflates the proposed housing figure due to

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

The SHMA needs to be revised, and the proposals based upon it reconsidered, before the Plan can be viewed as ready for submission to an Inspector. In addition, an immediate start should be made on calculating student requirements separately using a consultant with appropriate expertise. It is probable this exercise will reduce the OAN.

Revision of the SHMA to take account of the consequences of the vote to leave the European Union has been proposed by a number of consultees and the Council leader. The NMSS SHMA Review makes an important contribution to the way ahead in several respects by showing that:

- even with a relatively strong pre ‘Brexit uncertainty’ economy, and using a stronger trend period than the one used by GLHearn for migration flows within the UK, the GLHearn OAN figure was too high.
- simply making a few post ‘Brexit uncertainty’ adjustments to economic and demographic need, as currently calculated by GLHearn, would not be an adequate response because their approach to the economic data is flawed and they have not corrected for large errors in the historical data on international migration,
- student flows should be better understood and separated out to avoid distortion of the forecasts and, especially given the significance of flows of international students in Guildford, separate modelling of the student population will become more significant in future.

NMSS has advised that the new projections issued on 12 July 2016 should make little difference in Guildford as the household formation rates on which they are based are not significantly different from the 2012-based set.
It is most disappointing that demographic and economic model assumptions have been withheld by GLHearn so that the whole process cannot be cross checked. This means the OAN taken from their SHMA cannot be substantiated.

Green Belt and Countryside Study

This does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing instead in major settlements beyond the Green Belt.

- The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Eg It could be argued the sweep of open countryside rising up Gosden Hill, as you approach Guildford along the A3, is highly prized. So too is the role of Green Belt in preventing urban sprawl towards the Hog’s Back.
- Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.
- Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt as seen from surrounding AONB.

Transport Evidence

This has been produced very late and is incomplete and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

- It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. We assume various inconsistencies are errors (eg 1000 homes on Slyfield generating no extra traffic). More information is needed to understand how much congestion will occur, and where. This has not been provided in time to inform Plan proposals or responses. The analysis points out problems across the network and does not support the claim that the highways network can accommodate the additional demand arising from the Plan.
- The available evidence shows that the Sustainable Movement Corridor is in a preliminary stage of development. The information provided indicates that it cannot achieve its intended objectives along much of its route due to narrow roads and pinch points. The original concept has had to be diluted and impact on other routes, demand and an economic business case are required. The very concept of a single linear route as appropriate for Guildford is unproven.
- Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.
- No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.
- Information about the town centre as regards traffic, buses and parking is lacking in the Plan. The Plan does not address the traffic issues in the town centre. The Council has announced its intention of implementing the Town Centre Master Plan which includes making better use of the asset of the river. We submit that the Plan should include the protection of a route for a new bridge connecting the east and west parts of the town across the railway to maintain accessibility and to provide greater resilience in this key part of the road network.

For more detail refer to Appendix 2.

[Please Note: Additional transport information has been requested which it was not possible for Guildford BC and Surrey CC to provide in time for this submission. A list of the relevant questions has been submitted. GRA wishes to reserve the right to follow up aspects of this submission where lack of transport information (data or model assumptions) or absence of clarification leads to gaps or errors in analysis and observations.]
Guildford Retail and Leisure Study

This is an improvement but the credibility of the case for massively expanding retail space is undermined by trends in retailing and by the repeated failure to implement the North Street development. The economic value of the green and historic character of Guildford is not adequately considered.

Air Quality and Noise

NO2 emissions need careful monitoring in view of some sites being close to limits, revised estimates of premature deaths, issues with vehicle emission controls and misplaced optimism regarding congestion. Traffic noise from the A3 should also be reported.

Attached documents:  
GRA Report FINAL.pdf (1.6 MB)

Comment ID: pslp17q/467  
Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)

Question 1: The evidence base and submission documents

West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017

The revised “objectively assessed need” figure of 654 homes a year is too high and not based on sound evidence. This GLHearn number is derived from a demographic need for 558 homes a year, a figure which analysis of the evidence shows should be reduced to 404. The economic need assessment uses a flawed methodology.

GRA commissioned Neil McDonald, a respected national expert who used to work for the Government, to undertake a review of the 2015 West Surrey SHMA as it relates to Guildford. This assessment concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure for Guildford should be revised down. Neil McDonald also advised that a separate SHMA should be produced for student housing requirements in Guildford due to the distorting effect of student flows on the overall Objectively Assessed Need (OAN) forecast.

Neil McDonald has now undertaken a review of the 2017 West Surrey SHMA Guildford Addendum Report. See Appendix 1 for a copy of this which forms part of our response. (The Executive Summary is also reproduced in a text box for convenience.) As part of this review of the addendum report, he undertook a more detailed assessment to identify what causes the very large discrepancies between projected population growth in Guildford and actual growth as recorded in the census.

Neil McDonald has concluded that the demographic and economic need figures are fundamentally flawed to the extent that GBC cannot make an informed, evidence based decision on the housing figure. His analysis of the big gap between demographic projections and census figures in Guildford identifies under-recording of students moving away as the most plausible explanation. The ONS recognises that there are significant issues. His analysis also shows that if you correct for this recording error by making plausible adjustments for the outflow of students in the period 2001-15, this reduces the demographically-based estimate of the number of homes needed from 558 to 404 homes a year in the period 2015-34.

Executive Summary

i. This report reviews key elements of GL Hearn's report, “West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017” that relate to Guildford’s objectively assessed need for housing (OAN). It follows up an NMSS report in June 2016 on the aspects of the West Surrey SHMA that related to the Guildford OAN.
Producing projections for Guildford is challenging due to the large number of students and errors in the historical data

ii. Guildford presents many challenges to those seeking to project its future population and household growth. This is because it has a large student population and the historic population data for the district contains sizeable inaccuracies. The latter point is clear from the Office for National Statistics’ own data which shows that the population increase between 2001 and 2011 estimated using the ONS’s figures for births, deaths and migration flows (i.e. 15,000) is more than 90% larger than the increase suggested by the difference between the 2001 and 2011 census counts (i.e. 7,800). This is an exceptionally large discrepancy and indicates that there were large differences between how the ONS thought the population of Guildford was changing between 2001 and 2011 and what was actually happening.

It is probable that out-migration from Guildford has been under-recorded and, as a result, the DCLG projections have over-estimated the likely increase in households by a large margin.

iii. A detailed examination of the discrepancies between the various ONS datasets has shown that the only plausible explanation is that net migration into Guildford has been over-estimated, most probably as a result of a sizeable under-recording of migration out of Guildford.

iv. It seems probable that the under-recording of out migration has continued after 2011. This has major implications. In particular, the ONS’s 2015 population estimate for Guildford may be too large and DCLG’s 2014-based population projection may overstate the likely increase in housing by a substantial margin. An alternative calculation making plausible and logical adjustments to the estimated outflows in the period 2001-15 would reduce the demographically based estimate of the number of homes needed from 558 homes a year (2015-34) to 404.

Student housing needs are probably already catered for in the DCLG projections but a much fuller separate analysis is needed.

v. An examination of the DCLG projections for the growth of households of the type and age formed by students renting in the general housing stock in Guildford suggests, contrary to GL Hearn’s conclusion, that those projections include more than enough additional housing to meet the projected growth in the student population. However, there is a need for a fuller analysis which separates out student housing needs from other housing needs as the DCLG household projection methodology is not suited to estimating the needs of students and the inclusion of students in the statistical base used for the projections may have distorted the projections made for non-student housing.

The estimates of the number of homes needed to support forecast job growth need to be re-worked.

vi. The GL Hearn estimates of the number of homes needed to support economic growth are flawed as they use economic activity rates which are different from those used in the job forecasts on which they have based their estimates. This can have a large impact on the estimate made of the number of homes needed to support job growth, sometimes producing absurdly large figure. For example, if, when assessing the housing implications of a jobs forecast, GL Hearn assume that fewer people over 55 will be part of the labour force than was assumed when the forecast was produced:

a. GL Hearn will estimate that a bigger population would be needed to supply the workforce assumed by the forecaster – implying a need for more homes than are necessary.

b. The forecast will not be consistent with GL Hearn’s view of how the labour market will change. Indeed, had the forecaster used GL Hearn’s assumptions they would have concluded that the available labour force will be smaller and as a consequence forecast a smaller increase in jobs.

vii. The SHMA Addendum does not provide sufficient detail of the jobs forecasts for others to re-work the estimates of the homes needed to support economic growth. The unwillingness by some parties to release data assumptions is also an issue. Hence the only option is to invite GL Hearn to redo the analysis.

Affordability adjustment

viii. The earlier NMSS report showed that Guildford did not stand out from other Surrey districts in terms of affordability. It is a highly desirable place to live being surrounded by very attractive countryside yet with both a strong
local employment base and good commuter links to London. Increasing housing supply beyond the numbers suggested by the demographic analysis would not have a noticeable impact on house prices: it would simply attract more be to live in the area.

**Further work is needed before we will have a sound basis on which to estimate Guildford’s housing needs.**

ix. This review has shown that attempting to estimate Guildford’s housing needs using the DCLG projections with little or no adjustment has introduced large errors. Considerable further work is needed before there will be a sound basis on which to estimate Guildford’s objectively assessed need for housing.

x. In view of the desire to make timely progress with the Local Plan, it is proposed that an early meeting is sought with Guildford Borough Council and GL Hearn to discuss these findings and consider a way forward.

The Guildford SHMA needs to be revised, and the proposals based upon it reconsidered, before the Plan can be viewed as ready for submission to an Inspector. We trust that GBC will now pursue this as a matter of urgency.

Neil McDonald proposes a meeting with GLHearn in order for this matter to be resolved in the most timely way possible.

**Housing Delivery Topic Paper**

Paragraph 3.11 should not be construed as suggesting residents’ concerns were met. The sensitivity map still used the questionable approach that land meeting several criteria is more valuable than an area of Green Belt that plays a pivotal role in one respect.

This should refer to Woking applying Green Belt as a constraint and that it would be perverse to harm the Green Belt in Guildford to protect the Green Belt in Woking. Delay in the proposed Woking Site Allocations DPD is not a credible basis for meeting their unmet need in a place that is as constrained as Guildford.

Paragraph 4.10 lists constraints and suggests they were applied but gives no detail to show that they were and how. This is only described later in the context of Woking need. Paragraph 4.11 moves straight to seeking to meet need without setting out that transport, landscape, flood risk and Green Belt constraints represent major issues. These paragraphs should set out clearly at the outset the constraints and their application. You can expand subsequently that initially, as a result of paying insufficient attention to constraints in draft version of the Plan, you had advocated some development that you came to appreciate was unacceptable in planning terms.

Your suggestion in paragraph 4.11 that GBC can work to meet (supposed) need can only be made by not applying Green Belt protection, and by accepting traffic congestion will continue to be a major problem. Yet paragraph 4.11 even proceeds to suggest a big buffer can be provided in addition to an inflated need figure. The only concession is transport constraints in that some development will need to await transport infrastructure later in the plan period. Paragraph 4.12 is also weak, especially in the context of the failure to set out the application of Green Belt as a constraint in the preceding text. The logic behind “prior to removing sites, we first explored whether they could potentially be retained” is perverse. The focus should be on justifying removal from Green Belt not “removal from removal from” the Green Belt! The sites were inappropriate for removal from Green Belt in the first place for sound planning reasons. Similarly, there are strong planning reasons why Green Belt loss cannot be justified at various other proposed development sites within the Draft Plan.

In paragraph 4.15, the deficit from 2015 is overstated because need is overestimated.

Paragraph 4.36 is welcome, especially in view of the very large number of 798 permissions granted in 14/15

From paragraphs 4.39 on Green Belt, please refer to our comments in the Green Belt topic paper.

[See further comments]
**Green Belt Topic Paper**

This document provides the thinking behind relevant plan policies and proposals alongside the Housing Delivering topic paper. The approach to Metropolitan Green Belt lacks appropriate assessment at a more strategic scale.

The Local Context section is inadequate as a basis for applying policy.

Paragraphs 2.10 - We challenge the assertion that the Corporate Plan sets out an overarching local approach to Green Belt and countryside. These corporate objectives were not subject to consultation appropriate for determining planning policy. The current Local Plan is the relevant local policy context.

The fact that there was a boundary review as recently as 2003, the amount of land released at that stage, and the extent to which it has been developed, including how efficiently the land is being used, should be recorded. Green Belt reviews should be infrequent.

Paragraph 2.11 - The reference to our Green Belt being designated to function as part of a wider Metropolitan Green Belt needs expanding. The objective of providing an effective open area around London maintained in perpetuity requires a different scale of strategic approach than would be appropriate had this Green Belt been designed to serve Guildford uniquely. The 1987 Local Plan defined the Guildford part of the Metropolitan Green Belt not the Guildford Green Belt.

The section should also refer to the Mayor of London’s commitment to respecting Green Belt boundaries, including in the London Plan review.

The evidence base section relies on the approach adopted in the Green Belt and Countryside Study. We sustain our previous objection and register concern that remaining flaws in the approach to Green Belt purposes are being carried through into new documents. As a consequence, the new evidence does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing instead in major settlements beyond the Green Belt.

Inset villages - Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt as seen from surrounding AONB.

Replacement buildings – We welcome refinement of this policy.

Inset major previously developed sites - Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective. We do not agree with the assessment in 4.32 for relatively small sites and consider any planning applications should be considered on a case by case basis as exceptional development rather than pock-marking the designated area with inset sites.

Amending Green Belt boundaries
The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions. The Green Belt sensitivity analysis is not a valid basis for weighing the value of Green Belt and taking decisions.

Exceptional Circumstances

Paragraph 4.73 - This assessment is contested. The third sentence moves straight from need (based on a flawed OAN assessment) to amending boundaries without consideration of other options. It also refers to unsustainable commuting patterns.

The potential contribution of sustainable commuting should be considered positively. Green Belt is inextricably linked with making good use of the urban area it encircles, and also with commuting. Half of Guildford’s working population commutes outwards and half of the workforce commutes in. The pattern of locations is complex and includes places beyond the Green Belt. Building homes in Guildford will not change that pattern to any significant degree. The key is to make commuting sustainable and it should be embraced as part of Guildford’s strategy just as it is for London.

Paragraph 4.74 – The logic is flawed. It suggests development “would not fundamentally harm the main purposes of the Green Belt”. This is hard to sustain given the main purposes of openness and permanence. It then suggests Green Belt constraint is being applied a little bit and further that in some instances this will take account of how many Green Belt functions a parcel of land serves. The focus should be the strategic importance of each part of the Metropolitan Green Belt. As has been mentioned, Green Belt that serves fewer functions well, eg providing a strategic gap, should be valued.

GRA is concerned that Guildford is allocating more Green Belt sites than it can justify and Green Belt constraint should be applied far more rigorously. The draft Plan is advocating a string of development along the A3 which is inconsistent with achieving a ring of open countryside around London. The minimum possible, least harmful loss of the Green Belt sites should only be considered after all other options have been pursued. That is not the approach that has been taken. Failure to apply Green Belt as a constraint only to be required to assess whether we can meet the unmet need of Woking, which did apply constraints, is perverse.

Local Plan Policy Approach – Paragraph 5.1 is tantamount to an admission that political decisions have been a major driver.

Attached documents:

Comment ID: pslp17q/469  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent: [Blank]

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: [Blank]

Transport Evidence and Submission Documents

Assessment of the revised evidence leads to the conclusion that there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered and further work is being undertaken. There will be problems across the network and analysis does not support a claim that the highways network can accommodate the additional demand arising from the Plan.

It is becoming ever more evident that the Sustainable Movement Corridor cannot be delivered as proposed or achieve its intended objectives along much of its route due to narrow roads and pinch points. Cycle provision can be improved but along much of the route bus improvements will be confined to a little easing at junctions leaving buses to sit in queues with other vehicles during peak traffic. The impact on other routes needs to be assessed.

Evidence on bus travel is fundamentally compromised because there is still no clear and workable location for a bus interchange to inform the evidence, policies and sites and to provide a basis from which bus routes can be planned.
More generally, uncertainty over transport planning for the town centre continues to be a problem. The Plan does not adequately address the traffic issues in the town centre including a route for a new bridge connecting the town across the railway to maintain accessibility and to provide greater resilience in this key part of the road network.

The following comments are provided by transport expert Richard Jarvis.

**Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report: high level review of potential key changes in the Guildford Borough PSLP: strategy and sites June 2017**

This presents a qualitative assessment of the effect of the changes made to the 2016 plan on traffic forecasts. Essentially, because the amount of development in the plan has been reduced, GBC’s argument is that things will be better than estimated in 2016.

We can readily agree that where development sites have been removed, notably as in the case of the Normandy/Flexford strategic site, the forecast traffic level will be lower in the vicinity of the development. However, there are some sites where the planned development is now greater than in 2016.

There are also potential changes to plans outside the borough to be taken into account, such as Dunsfold Park, which may have significant consequences for Guildford, as was pointed out by SCC and GBC in their submissions to Waverley in response to that planning application.

The trip rates used in the forecast assume a level of public transport use and an appropriate level of bus services.

On the evidence provided by the SHAR based on the 2031 traffic forecasts using the SCC traffic model, **congestion will be widespread in peak periods across much of the highway network, including on strategic routes. The A3 and M25 are forecast to be at or over capacity. The cumulative effect of the additional traffic generated by the developments in the plan will be to increase congestion, even with the proposed highways schemes in place.**

Interpreting the model results is not straightforward, as was pointed out in response to the 2016 consultation. Table 4.12 is significant – showing the roads with the ten largest ratios of flow to capacity for Scenario 3, which includes all the planned development but not the major strategic route improvements on the A3 and M25. There is no equivalent for Scenario 5 (i.e. with the strategic improvements), but we can infer that all the roads in Table 4.12 will be at or over capacity in Scenario 5.

With regard to the comments on **Policy A6: North Street redevelopment** (page 9), the model used for the Strategic Highway Assessment is not sufficiently detailed to provide a satisfactory assessment of conditions on the town centre road network. This has been recognised by GBC and has led to the commissioning of more detailed analysis using a simulation model. Added to which, there is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the draft Town Centre Regeneration Strategy, which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. **Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of such a reduction will be far-reaching.**

**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.

The improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 S-bound carriageway, nor an understanding of the implications of the SMC for the allocation of highway capacity on the local roads. What is self-evident is that the **pressure on local roads in Burpham is already intense in peak periods, and these roads are not**
suited to carrying large volumes of traffic. Under the plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demand to the A320 and roads in Jacob’s Well.

The change to Policy A29: Land to the south and east of Ash and Tongham involving more houses means that there will be more traffic locally. While this will not be ‘major’ in terms of the borough as a whole, it will be significant locally. Ash and its surroundings will be impacted by the large Wellesley expansion in Aldershot. It is not clear to what extent the modelling reported in the SHAR allowed for this development. The pressure on the A331 and the roads connecting Aldershot to Guildford and Woking will increase.

The M25 is forecast to be at capacity after the planned improvements have been introduced, as shown both in the SHAR and also in the recently published DfT/HE report on the South West Quadrant. This is relevant to Policy A35 Wisley airfield. It should be noted that RHS Wisley is expanding its facilities with the aim of significantly increasing visitor numbers. The DfT/HE Stage 3 report concludes that the focus should not be on widening the existing road further beyond currently planned schemes but on how to reduce pressures and provide parallel capacity to relieve this part of the network. If the M25 and A3 are at capacity, then the Wisley development will add pressure on local roads that are not well-suited to carrying higher volumes of traffic. This is also relevant to the proposed developments at Burnt Common. The consequences for Ripley are likely to be serious. It is noted that Policy A35 now includes a requirement for mitigation of impacts in Ripley and on surrounding roads, which is some recognition that there will be a problem.

A comprehensive up-to-date analysis is required to inform decision-making. This should include analysis of the mid-term stage of the plan, before the A3 improvement is complete, as well as 2034.

Doct Ref T13 Transport Strategy

Section 1 Overview. The description of existing conditions and challenges is broadly correct and welcome.

Section 2 Surface access to airports. The problem is that the improved A3 will be at or over capacity in peak periods under the Plan, and the M25 SW Quadrant study has concluded that the M25 will be overloaded. So surface access to Heathrow from Guildford will continue to be affected by the weaknesses listed in this section.

Section 3 Rail. This section is welcome. However, it is noted that Crossrail 2 has not yet been secured. We had previously commented information on the demand for and capacity of rail services is needed and that the main line to London is already extremely busy in peak periods.

Section 4 Strategic roads. Surely the strategy should be aligned with the position of Highways England set out in the Topic Paper on Transport, where it is evident that the improvement of the A3 will not be completed until 2026/27, or even 2027/28? The removal of schemes SRN1 and SRN6 from the list of key infrastructure for the plan, and redesignating them as ‘aspirational’, is inconsistent with the safety objectives of the borough and surely of Highways England and Surrey County Council as the highway authority. Under the strategy and the Plan, the issues for Beechcroft Drive and the weaving and merging issues on the existing A3 will not be addressed until halfway through the plan period.

Section 5 Local roads. While welcoming the aspiration to transform the town centre, the traffic implications have not been dealt with in the strategy or the Plan. Section 1 correctly included the issue of “severance of the town and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey”. The case for a new crossing of the river and railway relieving pressure on the Farnham Road railway bridge should be taken very seriously and examined in depth. There is a real risk that a significant reduction in capacity in the town centre, both the gyratory and Walnut Tree Close, and on routes carrying the SMC, will lead to road users transferring to minor roads around the town that are unsuited to carrying more traffic.

The M25 SW Quadrant study report recommends that alternative routes are developed to carry orbital traffic, and this could mean more use of the A31/A331 in Guildford. There are local roads where capacity is already an issue and planned growth will add to problems that are not mentioned in this strategy. The scope of this element of the strategy is not wide enough.
The bus transit strategy is welcome. However, there is insufficient information on the Sustainable Movement Corridor to gauge either what it might deliver and its potential impact on road capacity. The statement under ‘Anticipated improvements’ that the New Sustainable Movement Corridor provides rapid and reliable bus journeys in Guildford urban area and links...’ has not been demonstrated. Consultants have been carrying out studies but the results have not been made public in time to inform this consultation.

A high quality bus station in the town centre is critical for the future of the town.

There is a lack of park and ride on the east of the town and not even an aspiration for future provision.

The active modes strategy is welcome. However, many roads in the borough are two-lane carriageways of restricted width, with little scope for allocating space for cyclists, and this has to be either accepted or addressed over the long term.

Section 6 Air quality. If traffic is going to increase in aggregate, as the forecasts show, even with the measures being proposed, then air quality will continue to be a concern.

Section 7 Road safety. The proposals are welcome, but as stated above, the schemes SRN1 and SRN6 should be reinstated in the Plan for safety reasons.

Section 8 Programme and funding. See comments on Topic Paper: Transport and the Infrastructure Schedule (App C).

Topic Paper: Transport

This is a helpful paper providing context and background to the transport aspects of the Plan.

The fact the new supplementary technical work is planned to be carried out prior to the submission of the plan to the Secretary of State (para 3.18) is welcome, but it would have been better if the results had been available for this consultation.

It is recommended that the wider evidence base should be expanded to include the following:

- Local Enterprise Partnerships and Local authorities: Influencing Strategic Transport in the South East, WSP, 2016
- Surrey County Council: Response to Waverley borough Council on WA/15/2395 Dunsfold Park, Dec 2016
- Guildford Borough Council: Guildford Town Centre Highway assessment –Town Centre Highway Layout Concept Testing, WSP, April 2016

Air Quality Assessment

We welcome this new evidence, especially given revised estimates of premature deaths and health impact, issues with vehicle emission controls and misplaced optimism regarding congestion reduction in 2011.

The air quality effects of anticipated increased congestion on roads around the town centre should be carefully modelled and monitored. The cumulative effects of more development, rerouting buses, traffic displacement including pedestrianisation and interceptor car park expansion should all be considered. For example, York Road continues to be a sensitive site having experienced NO2 exceedances over several years. It has vulnerable school children in the vicinity and is expected to cope with much diverted traffic even though it is already beyond capacity and congested at peak times.

The air quality impact of increased traffic from Dunsfold coming into the gyratory should be monitored.

Traffic noise from the A3 should also be reported.

Attached documents:
Retail and Leisure Study addendum (2017)

The update is welcome but still appears to lag behind the pace of change in retail space demand. In an era when people will seek a mix of technology alongside retail venues that offer an agreeable “leisure experience”, the characterful shops that make use of old buildings can become an increasing draw, an asset that cannot be replicated in many places nationally. For leisure more generally, insufficient attention is paid to environmental character and quality as part of the attraction of Guildford.

In order to inform priorities, evidence should consider the relative merits of adding further retail space, that risks relegating the High Street to a secondary zone, versus using more of sites such as North Street for high tech incubator businesses linked to 5G and for housing. Would confining new shops to the North Street frontage and providing for these other uses (and a bus interchange) behind be more appropriate. If a new department store is added, is an existing one likely to fail?

Land Availability Assessment (LAA) (2016) and addendum (2017)

Green Belt protection, landscape impact, flood risk and transport constraints should be applied to establish more appropriate sites and housing figures. Sites that need safeguarding for future infrastructure requirements such as a tunnel also need adding.


Open Space, Sports and Recreation Assessment 2016

Rural Economic Strategy 2017

We do not consider the range of options assessed in the Appraisal to be appropriate.

The report identifies significant effects.

West Surrey Functional Economic Market Area (FEMA)

Guildford Town Centre Regeneration Strategy 2017
1. There is a failure to correct errors in the historical data for international migration flows. There has been an overestimate of 90% in births, deaths and migration flows in the years between 2001 and 2011. This has been exposed by the two latest censuses. Real numbers versus estimates! Surely this should have caused an adjustment in the OAN?

2. Most residents who live in close proximity to the University know that houses with good gardens, built for families, have become HMOs to accommodate students. This has reduced many neighbourhoods to seedy university dormitories. The Plan makes some recommendation for housing on campus but as the university expands this is inadequate.

3. The plan to include “affordable” houses is wishful thinking. GBC can not enforce their designation of percentage of affordable homes per development as witnessed by the Methodist church development. Where are the plans to build more council houses? These are the only affordable homes.

4. Building more houses to promote growth is a flat contradiction in terms. More housing results in more traffic congestion resulting in man hours lost to employers and more pollution for residents. Huge uncertainty hangs over the practicability of all of the schemes to alleviate Guildford's horrendous traffic congestion. Will money be available to implement these post Brexit?

5. Why have no constraints been applied? The incursion into the Green Belt is unacceptable. The division into Blue and Green Infrastructure can't gloss over this and expressing the loss of green belt land as a percentage is a sham. More houses, more traffic, more pollution less green belt – all in the name of growth. Where does it end? No one wants to live in a ghetto!

Attached documents:

**Comment ID:** SQLP16/1383  **Respondent:** 8559297 / Holy Trinity Amenity Group (Robert Bromham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

The housing and retail (comparison) targets are not up to date, neither are they adequate. Apart from inherent flaws both are likely to be affected by Brexit.

Attached documents:

**Comment ID:** SQLP16/2021  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

The Guildford Society remains seriously concerned about the robustness and accuracy of the Strategic Housing Market Assessment.

An independent review commissioned by the Guildford Residents’ Associations has uncovered flaws in both the principal modelling and the application of the numbers in reaching the consultant’s recommendations.

Despite representations prior to and as part of the 2014 consultation, the Settlements Profiles Report falls a long way short of the necessary standard – it is still full of errors and fails to take any sensible account of the 50% or so of the Borough which lies in the Guildford Urban Area.
There is considerably more traffic data sitting behind this draft. It was unfortunate that this was delivered so late, leaving insufficient time to review it fully. The initial studies of it show there to be several fundamental and yet unexplained assumptions about future traffic use. The detail provided so far in relation to the Sustainable Movement Corridor is not sufficient to support or reinforce the wider traffic assumptions for the town centre, local road network and strategic road network.

The Society still has reservations about the approach to land parcelling and consequent findings arising from the Green Belt and Countryside Report. We recognise there is a need to plan to use some Green Belt land to achieve the Plan Objectives (which are in part predicated by the flawed SHMA).

More detail about our concerns about the Evidence Base are in our original submission of 2014 and, where additional emphasis is required, in the submission in response to this Regulation 19 Consultation.

**Attached documents:**

<table>
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<tr>
<th>Comment ID: pslp17q/510  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
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The Guildford Society has reviewed the thousands of pages of the Evidence Base and, to the best of its ability and, with limited (voluntary) resources, has considered the content and context of each.

We have some concerns about documents that are not up to date (for example the Affordable Housing Viability Report (2014) – although we note AECOM have commented in their updated Sustainability Appraisal (2017) that they believe this to still have currency) and some updated documents that we consider to be inaccurate (such as the 2017 Addendum to the Strategic Housing Market Assessment).

Our response are partly linked to the specific policies and paragraphs of the draft plan where they have been amended, and partly in our response to Appendix D, where changes to the evidence base may have altered the effect, efficacy and appropriateness of unamended paragraphs in the plan.

**Attached documents:**

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<th>Comment ID: SQLP16/318  Respondent: 8562209 / C J Cooper  Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer:</strong> (Yes)</td>
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I object to the local plan as I consider it is unacceptable as it will have a bad effect on traffic and the living conditions of local residents.

**Attached documents:**

<table>
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<tr>
<th>Comment ID: SQLP16/992  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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The Clandon Society is the residents’ association of East and West Clandon. We have serious concerns about many elements of the draft Plan.

24A. Question 1: Evidence Base. We do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

- The evidence base documents are self-evidently not up-to-date in that they take no account of the radically changed environment and outlook following the referendum. This is hardly the fault of the Council but is nevertheless a serious flaw.
- The Transport Assessment was published at the same time as the Plan leaving little time for study and analysis. The projections contained appear to be quite inadequate in that 1) they average congestion over 3hr time bands thus materially reducing the impact of congestion and 2) they do not model junctions
- The “Assessment” shows that congestion will worsen significantly over the period of the Plan even if all the proposed infrastructure is built.
- The SHMA attempts to justify an OAN based on a very aggressive desire for growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are not transparent and have not been adequately scrutinized by Councillors so that people have to take on trust the work of a consultant. In any case events have overtaken the SHMA.
- The number and complexity of the documents in the evidence base make reading, understanding, analysis and assimilation extremely difficult.

Attached documents:

<table>
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<th>Comment ID: SQLP16/177</th>
<th>Respondent: 8565153 / Mr David Gianotti</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer:</strong> ()</td>
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<td>So specifically:</td>
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<td>- I object to a document that is over 1800 pages long and not user friendly;</td>
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<td>Attached documents:</td>
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<th>Comment ID: SQLP16/522</th>
<th>Respondent: 8567105 / David Calow</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer:</strong> (No)</td>
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<td>Your plan was prepared before the Brexit referendum which must affect your assumptions.</td>
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<th>Comment ID: SQLP16/396</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent: Fiona Curtis</th>
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</table>
**Answer: (No)**

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**Infrastructure**

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would...
have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF'. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.
The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA , but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy
The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

**Strategic Housing Market Assessment (SHMA)**

I Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, **the housing need figure should be revised down to 510 homes a year** and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

**The Land Assessment**

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed, Thus reducing justification for release of the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

**Green Belt & Countryside Study**

I object

GBC’s Green Belt & Countryside Study does **not value appropriately the “fundamental aim”** of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for
London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

**Attached documents:**
- NMSS SHMA review annex 5.pdf (1.3 MB)
- Green Balance SHMA review annex 6.pdf (469 KB)
- Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)

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The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

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**Comment ID:** pslp17q/658  **Respondent:** 8570273 / Fiona Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** ()

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The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford.

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**Comment ID:** pslp17q/659  **Respondent:** 8570273 / Fiona Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** ()
B3000 -- Omission from Transport Strategy

This road is considered a strategic route, yet it is narrow in places, windy and close to many residential properties. Pollution levels are outside EU legal limits at the A3 end of the village and congestion is a regular feature, suggesting the road is at / has exceeded capacity. Adding to the network will cause gridlock as there are no alternative East West routes, south of Guildford. Consideration must be given to address this, yet no scheme has been outlined in this plan.

Object to the omission

 Attached documents:

Comment ID: SQLP16/1792  Respondent: 8573505 / Anthony & Hazel Teal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

We wish to express our concerns over the Draft Local Plan, currently out for public consultation and formally register our objections to what is being proposed very strongly indeed. It has been an extremely elusive and difficult document to try and get to grips with in order to understand the implications for the borough and our locality in particular. While it is essential to have a sound and robust Local Plan in place, the policies being put forward currently appear unsound and unsustainable.

Attached documents:

Comment ID: SQLP16/1285  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

See my letter dated 15/7/16

Attached documents:

Comment ID: pslp17q/306  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)

No.

The housing number is still significantly overstated and the Council Executive has refused to reveal the full details of the underlying calculations to those who have requested them. The Scrutiny Committee has refused to scrutinise the SHMA.

As part of the previous consultation I raised a number of issues, questions and requests for further detail concerning the SHAR (2016) and its associated Validation Report. This followed criticisms of the previous SHAR that were not
addressed in the 2016 version. No attempt has been made to address the issues, my questions remain unanswered, and the details have been withheld.

The modelling choices and assumptions made mean that current traffic levels have been severely understated. The result is that forecast traffic levels resulting from the plan are far less likely to indicate levels of congestion requiring roads infrastructure development, and the current infrastructure development plan is just the tip of the iceberg of what would actually be needed. The Council Executive seems willing to plunge Guildford Borough into traffic chaos in pursuit of population growth, rather than face up to reality and apply a traffic constraint.

I note the criticisms raised by Highways England in their representations dated 18 July 2016 and find it extraordinary that GBC were prepared to rely on a high-level strategic model that did not even allow for back-blocking. Any resident of Guildford will be aware of the back-blocking issues that arise in the town.

Highways England is only concerned with the Strategic Road Network and the impacts on the Local Road Network should be a concern for SCC. However, as SCC carried out the modelling exercise it seems clear that, between them, GBC and SCC have no interest in identifying the real roads infrastructure needs that would arise from this aggressive growth plan.

It is not sufficient to say that detailed work on traffic impacts will take place as part of a planning application. Green Belt land will have been released for development, for no good reason other than to remove planning constraints, before viability has been demonstrated. Furthermore the transport assessments carried out by developers are not independent and are aimed at seeking approval. I doubt the ability and willingness of GBC and Surrey Highways to scrutinise them with sufficient diligence.

There was no mandate to carry out a Green Belt and Countryside Study and it is seriously flawed since it suggests the release of Green Belt land without providing genuine justification.

Attached documents:

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<th>Comment ID: SQLP16/961</th>
<th>Respondent: 8575585 / Ian Macpherson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Question 1 The evidence base and submission documents

Unfortunately the evidence used is not wholly adequate, up to date or relevant. This is as much the result of recent external events as matters within GBC's control

The key areas are * cooperation, * housing and *transport.

* COOPERATION

Set originally for reasons stretching far back into mediaeval history, the local authority boundaries do not any longer reflect real market boundaries. The Guildford work, shopping and housing areas stretch over the County boundary into Rushmore and far beyond. For one example, the 'market' pool of cheap housing for Guildford is in Aldershot. The draft shows signs of discussions with Waverley and Woking but little evidence of in-depth cooperation with Rushmore and beyond - instead,

Rushmore and beyond authorities are cooperating with authorities to their west, but not to the east. THE ORIGINAL 1944 SPECIFICATION FOR GREEN BELT POSTULATED THAT EXPANSION

WOULD LEAP THE GREEN BELT. That is Rushmore, not Gosden Hill Farm.
* HOUSING

That the Hearne calculations for housing demand are substantially flawed appears to be a common view, now apparently visibly based on an alternative expert calculation. However, since these original calculations were attached to the Plan documents there has been the major event of ‘Brexit’. It is expected that Brexit will lead to a considerable decline in immigration from the EU, and, since criteria are likely to be tightened, of some immigration from outside the EU. Not so much of a decline as a simple look at the crude national figures, or the relevant pages in Hearne might suggest, but nevertheless a considerable decline is said to be likely. At the same time it is expected that there will be a period of economic stagnation or low growth, which will lead to a decline in the setting up of new households. So it looks as if the Hearne figures will have to be re-visited, regard less of views as to their original validity. It is understood [verbal] that GBC has this in hand. However it would seem to be demonstrably premature to proceed to acceptance in advance of re-visited and agreed figures.

It is customary in estimating work to publish conclusions that give a mean estimate with a sub estimate of upper and lower tolerances. The Hearne tables appear largely not to do this - instead to put forward a single integer estimate refined to the last digit [as eg 693]. This is surprising, and a word of explanation as to the level of accuracy in the head line figures would be helpful.

TRANSPORT

The sections on transport are the most difficult. They are really quite vague, promising events that are not within the ability of GBC or SCC to deliver.

The lead promise is, of course, the improvement of the A3, where all is vague as to exactly what is to be done. It is not clear how much of the road and transport system can be sorted.

But there are many other examples, improvements and changes in the bus and rail services being one.

Bus and rail services are provided at the will of the relevant operators, and a service exists only where the operator anticipates a profit or, in the case of rail, is required by central government. There are a few exceptional bus services that are subsidised, but the relevant Authorities only have very limited funds for this purpose - funds that are being cut and will probably be cut further. Moreover, it seems possible that the Senior Bus Cards will be withdrawn or severely limited, which will reduce the profitability of the existing services further and lead to consequent substantial reductions in the services for all.

Attached documents:


Answer: ()

EPC supports the sites selections in Effingham identified in the Land Availability Assessment (LAA):

- The Bam (Site Ref 1040)
- Church Street Field (Site Ref 99)
162. Local planning authorities should work with other authorities and providers to: assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands take account of the need for strategic infrastructure including nationally significant infrastructure within their area.

Water
Thames Water acknowledges in local forums that they have water shortage problems and are considering pumping water from the river Severn on the Welsh border to a yet to be built raw water reservoir of approximately 4 square miles and 100 feet deep in an area adjacent to Abingdon. This water would be pumped into the river Thames for extraction downstream. This project is ‘being discussed’ but currently 3.5 million homes are involved in ‘water saving’ practices due to water shortage in the South East early summer of 2017.

Air Pollution
Air pollution is currently exceeding national and international annual daily average guideline levels of 40μ/m3 along the A3, Ripley Parish Council has the full set of data for Ripley as a base indication of Levels in the Borough.

Roads
Highways England has stated by letter to the Council dated 5th October 2016 that none of the roads proposals mentioned in the local plan have been tested to meet the Design Manual for Bridges and Roads, for the simple reason that there are no firm proposals for any of this road infrastructure at the current time. It is disingenuous for a local plan to be presented to the Secretary of State that makes reference to infrastructure that won’t be provided in the plan period, if at all. The Highways England response supports other statements made indicating their desire to prioritise the Smart M25 then M25 J10 A3 and then the A320 – A31 improvements. Thus, the required infrastructure for Garlick Arch, Gosden Hill and Wisley airfield will not and cannot be constructed within the time frame of the Local Plan, without a complete ‘about turn’ by Highways England. In addition, some early targeted small improvement schemes referenced by the local plan are
not committed proposals and cannot be relied upon to be delivered within the plan period [see Highways England letter 5th October 2016]

Our response to other representations made.

NPPG 155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

The Plan is not future proof in respect of Infrastructure, has been produced in a flawed statutory process using a closed “this is what you are getting approach” with little notice being taken of restrictions to potential proposals, suggesting inadequate infrastructure which simply cannot be supplied within the life of the plan. (Under current funding)
- Highways England from their public statements clearly have no intention of solving traffic problems or providing completed solutions through Guildford within the life of the plan
- Network Rail have no intention of introducing new railway stations –
- Thames Water will struggle to supply water or treat sewage without major and as yet unfound finances.
- The statutory procedure has not been followed. No ‘complete’ plan with catalogue or index document of associated documents exists for members of the public to scrutinise.
- Consultation with the general public has been substantially flawed in that no document has been corrected, no change of planned policies have occurred which reflect responses from the community especially and specifically from the submissions from Burpham residents. Highlighting Traffic lack of infrastructure and pollution effects from Gosden Hill site – GBC Claiming under FOI this detailed information is commercially confidential’ as opposed to the Blackwell Farm and Wisley proposals which have been clearly aired in the public domain.

Thus this plan is fundamentally flawed in its statutory and central government policy approach, its assumptions to sustainability are flawed and will fundamentally reduce the quality of life of those already living in the Borough. This can only be cured by a projected £2 billion (Tunnel, Sewer, Drinking water, General road widening) injection of cash into the infrastructure to provide a sound basis for the next two plan periods up to 2050. Such is the mismatched infrastructure failings to policy proposals.

Attached documents:  BNF_comments_Local_Plan_19_07_17__23_25_table.pdf (5.3 MB)
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:
The Guildford Infrastructure Baseline 2013 sets out the position with regard to Primary Health care Facilities. It refers to the Surrey NHS Transformation Plan 2010 to 2015 which includes the key objective of reducing health inequalities through the provision of GP-led Health Centres and acknowledges that primary healthcare services are generally the first point of contact service, offering frontline services.

All GP practices are now required to belong to a CCG. There are six CCGs covering Surrey, all within the Surrey and Sussex Local Area team (LAT). Three CCGs cover different parts of the Guildford Borough including Guildford and Waverley CCG.

Guildford and Waverley CCG is a group of 21 local GPS surgeries in Guildford and Waverley. It controls a £223 million annual healthcare budget responsibility for the approximately 220,000 people living in the two boroughs.

There are currently a total of 99 GPSs currently practising in 11 partnerships across the Guildford borough with a total of 154,998 patients on their registers. The existing provision equates to one GP for every 1,565 residents. However, provision is not spread equally across the Borough and when examining local list sizes per GP some existing under provision is apparent on surgery- by-surgery basis.

Figure J shows the data on a settlement basis. However this list does not include the Binscombe Medical Centre. This presumably, is because it s not actually located within the borough. Nevertheless, it serves patients from Guildford and should therefore be considered within the Guildford context. This is a key cross boundary issue that does not appear to have been adequately considered.

The Guildford draft Infrastructure Delivery Plan 2016 confirms but does not update the Infrastructure Baseline. It states at paragraph 6.2 that GBC officers have met with representatives of Guildford and Waverley CCG, GPs from across the borough, NHS England, and the Royal Surrey County Hospital chief officers to discuss future health needs of the borough’s population. It goes on to confirm that such work is ongoing and, as clarity is given to proposals, further input is anticipated from Guildford and Waverley CCG and from the GPs practices that will be impacted by the planned housing development.

Paragraph 6.7 of the draft IDP states that: “We will continue to work with NHS England and the relevant CCGs, particularly Guildford and Waverley CCG, the GP Practices, and the Royal Surrey County Hospital, to ensure that health facilities in the borough will meet the health needs of future population, and will continue to work on ensuring that funding and delivery is secured when needed.”

This statement is gratifying and is supported. However, as stated above, it is considered that the cross boundary issues between Guildford and Waverley have not been adequately addressed. A new Centre for Health is required to serve the cross boundary area around Farncombe as set out at Question 6 of this form and an additional allocation should therefore be made to facilitate this.

The plan on page 63 of the IDP shows the GP surgeries within Guildford Borough. This should be renamed as ‘GP surgeries serving patients within Guildford Borough’. That said, one GP surgery is indicated on the borough boundary with Waverley – GP Surgery 10 which is referenced New Inn Surgery. This is incorrect and we believe that what should be shown is the Binscombe Medical Practice

Attached documents:

**Comment ID:** SQLP16/405  **Respondent:** 8591041 / Surrey Wildlife Trust (Mike Waite)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

Guildford borough Proposed Submission Local Plan: Strategy and Sites Regulation 19 consultation (June 2016)

Thank you for your consultation on the above document. Please find below the comments of the Surrey Wildlife Trust, which are confined to issues concerning the protection of the natural environment, including the conservation of Surrey’s biodiversity. Our most recent communication with you on this matter was our letter of 22/09/2014, where we detailed a range of concerns with the emerging Strategy & Sites document of that time. Some of these have been reflected in the present version now on consultation, but others have not. Overall, we remain concerned that the dependencies of present and future human society on maintaining a healthy and thriving natural environment are reflected adequately in the emerging Guildford Local Plan Strategy & Sites.
National planning policy in the NPPF aims to plan only for *sustainable* future development and economic growth. That sustainability is defined in part, as the ability to clearly demonstrate a contribution to protecting and enhancing the natural environment; including to “improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change.” The opportunity to clearly articulate the potential for synergies here (as opposed to tensions) is overlooked at various points within the plan (see comment on para. 4.6.31 below), but especially under the definition of ‘sustainability’ in the Glossary at Appendix A.

Our comments are structured to correspond with the questions as set-out in your consultation questionnaire.

**Question 1: The evidence base and submission documents. Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?**

Regarding the accurate characterisation and valuation of the natural environment, the Borough’s Local Wildlife Sites (Sites of Nature Conservation Importance) are still being reviewed. Whilst this latest iteration of the Local Plan Sites & Strategy makes due reference to the importance of the natural environment to Guildford’s economy and the well-being of its occupants, we feel that this is not translated consistently into policy for the various sites allocations.

To reiterate the point made originally in our previous response, Guildford Borough has arguably the clearest responsibility for the conservation of English and UK biodiversity of all Surrey’s boroughs and districts, with a wealth of declining and nationally-restricted wildlife species under its charge; this is still not adequately reflected in the plan (eg. at paragraphs 2.23-5) nor the underlying evidence base.

**Attached documents:**

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- c. I object to the vast amount of paperwork involved in the Plan. Its effect is to put off many people from reading it. A concise Summary should have been included. I object to the short period allowed/Regulation used for the Consultation period. The amount of documentation available, combined with the shortened time available to comment - and to be made during the holiday period is contrary to UK democratic principles.

- d. I object to the failure of the controlling Conservative Group on GBC to uphold their Manifesto promise to protect the Green Belt. This promise was included in their election literature in May 2015. They thus have no mandate to implement a Plan involving major intrusions into the Green Belt.

**Attached documents:**

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<th>Respondent: 8593185 / Niels Laub</th>
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The West Surrey SHMA which determines the "objectively assessed need" for Guildford is flawed for the following reasons:

**517 houses per annum to accommodate Demographic Indicators**
The starting point in establishing housing need due to “demographic indicators” is the SNPP. G L Hearn claim that the 2012 Based SNPP is a robust starting point because it shows a level of population growth that falls roughly in line with a 12 year trend to 2013. The 2012 Based SNPP predicts the population of Guildford to grow to 161,300 by 2031. In actual fact, the linear trend based on 2001-2011 predicts a population of about 156,000, a difference of 5,300.

The ONS 2012 Based SNPP is significantly distorted by an unusual increase in the number of overseas students attending the University of Surrey between 2006 and 2011. This is clearly demonstrated in a number of figures and tables in the report (see Figure 15 on page 50; Table 17 on page 51; Figure 18 on page 53). To establish its projections, the SNPP only looks back over the previous five years. The 2012 Based SNPP is therefore based on population trends between 2006 and 2011, a time which saw the number of overseas students at the university increase by 35% and full time students increase at a rate of 700 per annum.

If you consider natural growth (births and deaths) and net internal migration (movement within the UK), the 2012 Based SNPP forecasts the population of Guildford to decline by 1800 by the year 2031. Therefore the overall projected increase in Guildford’s population to 161,300 in 2031 is entirely due to the projected growth in net international migration of 23,100, of which, according to the ONS, 57% are foreign students who would normally be expected to return home, or move away from Guildford, at the end of their studies.

On page 190 in the SHMA, there is an assertion that overseas students only make up 6% of overall migration. According to the ONS, an analysis of indicative immigration estimates by broad stream (mid-2006 to mid-2010) estimates that the student stream is 57% for those years. Currently 37% of all students at the university are overseas students.

On the 1st December 2015 George Osborne announced that foreign students will no longer be counted as immigrants. The chancellor said that the public is concerned only about “permanent” migrants. “The public’s concern is about permanent migration, people permanently or for many years coming to live in the country. Students come and go”. Daily Telegraph 1 Dec.

International Immigration is based on International Passenger Surveys (IPS) which are carried out only at the border (seaports, airports, channel tunnel). The intentions of immigrants are highly approximate being based on voluntary face to face interviews on only a sample of passengers. IPS data is therefore not reliable enough to be used at Local Authority level. Estimates of net international migration at Local Authority level are therefore based on (1) the number of migrant workers or students applying for a National Insurance Number (2) data from the Higher Education Statistics Agency (HESA) and (3) data from the NHS Patient Registration Data Service. Unfortunately this data does not accurately record when students return home or move away from Guildford as students often neglect to inform their GP, which explains why emigration is often under reported.

Un-attributable Population Change (UPC) is essentially the difference between the forecast population and the actual population as recorded in a census. In Guildford the UPC ran at -717 per annum between 2001 and 2011. The population in Guildford was significantly lower as measured in the 2011 census than had been forecast. It is assumed that this is due to the under reporting of foreign students returning home. Nevertheless, in their “sensitivity tests”, G L Hearn has declined to make any adjustment for UPC. According to Table 22 on page 68 the housing need for Guildford would be reduced to 239 houses per annum if UPC were applied.

The figure on page 183 Appendix B demonstrates that Guildford has an abnormally high proportion of people in the 19-25 age bracket (students) which is to be expected because Guildford is a university town. While this has an impact on internal out-migration, it has a major and disproportionate effect on projected household formations because the 2011 Census measured the term time address of students as being their main place of residence with the assumption that the majority settle in the area and become heads of households, when in reality, being students, they are more likely to return home or move away from Guildford at the end of their studies. According to the Alumni Team at the University of Surrey, only 9% of former students live within the GU postcode, of which a high percentage are likely to have been brought up in the area anyway.

The figure of 517 houses per annum to accommodate demographic indicators appears to be based on the Figure of 496 taken from the 2012 Based Household Projections (see Table 20 page 66) multiplied by a factor of 104.2% to allow for occupancy levels for Guildford based on the 2011 Census (unoccupied houses recorded as...
being 4.2% of total housing stock). The NPPG clearly states that vacant properties should be deducted from housing targets.

25 houses per annum to accommodate Students

- In the report, the justification for adding an extra 25 houses per annum to the OAN to cater for students is because “the University of Surrey expects stronger growth in student numbers going forward than occurred during the period on which the SNPP is based”. In paragraph 4.79 page 72 the report states that “the 2012 Based SNPP is based on population trends between 2006/7 and 2012”. However we have already seen that the period between 2006/7 and 2011 was a time which saw an unusual increase in the number of students attending the university. Table C3 on page 187 shows that the number of students attending the university increased from 10,000 in 2006/7 to 13,500 in 2011/12, an increase of 3,500, which represents an increase of 700 per annum, which is very much higher than the 315 per annum increase the university forecasts from 2013 to 2033. This is also at variance with the University’s published Estate Strategy which states that they plan to grow at 2% per annum. There is therefore no justification for building 25 extra houses per annum to house students. In any event, surely the University has a responsibility to provide adequate student accommodation on campus to reduce the demand for affordable housing in the town. Out of a full time student population of 14,000, there is only provision for 5100 student bed spaces on campus.

How are students counted?

The way students are counted has always been an issue. In the 1991 Census, students were treated as living at their home address. In the 2011 Census, students were counted as being usually resident at their term time address. Overseas students, who had no usual address in the UK, were counted as usually resident in their halls of residence regardless of how long they intended to stay here. This has a distorting effect on the proportion of young people in Guildford and exaggerates projections for household formations.

How is the movement of students monitored?

Internal migration is monitored by (1) the number of migrant workers or students applying for a National Insurance Number (2) data from the Higher Education Statistics Agency (HESA) and (3) data from the NHS Patient Registration Data Service. Unfortunately this data is unreliable in recording when students leave an area because either they fail to un-register from their GP or, when moving abroad, fail to notify the Department of Work and Pensions. The ability to monitor people intending to move away from Guildford to live abroad (overseas students returning home) is even more fraught with difficulties.

120 houses per annum to support Economic Growth

- In the West Surrey SHMA, economic growth for Guildford is taken as 0.9% per annum being the average of three studies (Cambridge Econometrics Employment Projections; Experian UK Local Market Forecasts; Local Authority District Forecasting Model by Oxford Economics). Assuming only one person in employment per household, surely any increase in the supply of housing in excess of 0.9% would more than accommodate the needs of economic growth. One could argue that this is therefore double counting and there is no justification for an additional 120 homes.

- In any event, the impact of economic growth (or decline) for a particular area must be reflected in both the Census and in population projections based on past trends. Therefore the ONS SNPP must already reflect the effects of economic growth. It is therefore misleading and incorrect to make additional allowances in housing need to accommodate economic growth. Economic growth cannot be forecast with any degree of certainty as it depends on so many variables.

31 houses per annum to promote Affordability

- The supply of housing is actually regulated by economic factors, not simply the release of more land. Developers will only build in a rising market when they can afford to borrow money to build and buyers can afford to borrow money to buy - and crucially - when profits are guaranteed. Consider Ebbsfleet in the Thames
estuary, where the government announced plans to build a new “garden city” to provide 15,000 new homes. So far, despite the availability of land, only 100 homes have been built.

- Nor will releasing vast areas of the green belt guarantee to increase the supply of affordable housing. Indeed one could argue that greenbelt land is more likely to generate low density high value housing rather than affordable housing. According to a recent report, the biggest house builders in the UK currently have enough land to build more than 615,000 new homes, equivalent to three years housing supply in the whole of the UK.

Attached documents:

Comment ID: pslp17q/60  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)

The West Surrey SHMA is unsound in two significant ways because (1) overseas students, who are only here on a temporary basis to study, are included in statistics for net international migration which has an inflationary effect on population projections for Guildford and (2) because the term time address of students is taken as their permanent place of residence, the population of Guildford appears to have a very high proportion of people in the 18-24 year age bracket who are assumed to have a high probability of forming new households and settling in Guildford.

The 2011 Census recorded a population for Guildford significantly less than had been forecast. The ONS suggested that this discrepancy (referred to as Un-attributable Population Change or UPC) was probably due to the under-reporting of overseas students returning home. This discrepancy is so significant that, if an allowance for UPC had been applied, the housing need for Guildford to accommodate demographic indicators would be reduced to 239 homes per annum as opposed to 577 homes per annum in the current Local Plan. This problem would be resolved if overseas students were removed from statistics for international migration on the basis that they are only here on a temporary basis to study.

In the 2011 Census, the term time address of students was taken as their permanent place of residence. This means that Guildford appears to have a very high proportion of people in the 18-24 year age bracket who are assumed to have a high probability of forming new households and settling in Guildford when in reality students move away from Guildford at the end of their studies. This problem would be resolved if, for the purposes of projecting household formations, the home address of students should be taken as their permanent place of residence.

Finally, students generally should not be included in statistics for calculating housing need. Students need student accommodation, not housing. One of the problems we have in Guildford is that, because the university has not built enough Halls of Residence, students occupy an estimated 2500 affordable houses in Guildford which are therefore no longer available for key workers such as council employees, hospital employees, teachers, shop assistants etc. At the moment the university only provides accommodation for about 35% of their full time students despite a requirement in the 2003 Local Plan that they should provide accommodation for at least 60%. The University should be required to provide more student accommodation.

Attached documents:

Comment ID: SQLP16/1338  Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)
Normandy Parish Council strongly objects to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites ("Local Plan") and in particular to the allocation of land south of Normandy and north of Flexford for substantial development.

In principle objection to development of this site

The Parish Council opposes the principle of the development of this site:

(1) The site lies within the Green Belt, and has been assessed by Guildford Borough Council (GBC) as having high sensitivity in Green Belt terms, serving to check the southward sprawl of Normandy and northward sprawl of Flexford, preventing the merger of those settlements, and safeguarding the countryside from encroachment (see Green Belt Purposes Assessment, April 2014). Accordingly, given the very significant contribution made by the site to the Green Belt in this area, it should not be developed.

(2) The development of the site would not amount to sustainable development within the meaning of the National Planning Policy Framework. GBC's claim that the approach would be sustainable fails to attach any or any meaningful weight to the environmental aspects of sustainability.

(3) The proposed allocation has not been the subject of any proper assessment of highways impacts. The local road network is incapable of coping with the proposed scale of development and there is no evidence that the necessary highways improvements are feasible or deliverable within the plan period.

(4) The site lies within 1 km of the Thames Basin Heaths Special Protection Area and accordingly requires substantial provision of alternative green space as an avoidance strategy. Preferable sites for development elsewhere could be delivered without such provision.

The development of the site would significantly affect Normandy and the surrounding area and has not been justified in the Local Plan or in the supporting documents. In addition to the principled objections to the development set out above, the Parish Council considers that there have been substantial flaws in the plan-making process to date which go to both the merits and legality of the Local Plan.

Specific criticisms of the plan making process

A sound plan must be based on proper evidence and consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives (see Environmental Assessment of Plans and Programmes Regulations 2004/1633 and e.g. Calverlon PC v Nottingham City Council [2015] EWHC 1078 (Admin), per Jay J at (67)).

The history of the Local Plan is known to GBC. The Parish Council wishes to emphasise that in the 2014 plan, it was not proposed that this site be allocated for development. Since then, there has been no further Green Belt review, but there has been a Green Belt Purposes Assessment which identified this site as particularly sensitive in Green Belt terms.

There is no explanation in the published documents of the "exceptional circumstances" (NPPF, 80) that are said to justify release of the site from the Green Belt. The Green Belt Capacity Study does not explain why such exceptional circumstances exist, and nor does the Sustainability Appraisal ("SA"). Extraordinarily, the SA states that the development of the site is regarded as a "given" (6.3.16). The SA acknowledges (in footnote 68, p 131) the greater impacts on the Green Belt in developing sites such as this, but does not explain why such development is nonetheless justified on both environmental grounds and by reference to the exceptional circumstances test.

The SA is open to further criticism through its failure to accord any weight to the Green Belt in analysing various options. This is a significant deficiency which renders the SA unsound and indeed unlawful, since the alternatives are not subjected to proper analysis on environmental grounds.

Further, GBC has consulted on the Local Plan with the proviso that this site should be deleted from the plan should it be demonstrated the provision of a secondary school on the site is not required.
However, there has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the "exceptional circumstances" test. GBC's assessment of alternative secondary school sites notes that Surrey County Council's concerns as to remoteness of the site from development are as was only overcome by the new housing provision in the Local Plan i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

The Leader of GBC has suggested that the proposed houses should be regarded as "enabling development". The Parish Council submits that school funding should be achieved through the normal channels and not through the release of Green Belt land to housing development. This suggested cross-subsidy is an unjustified claim (there has been no viability analysis) and in any event is not a proper planning reason for allocating the site for development. The Local Plan is therefore unsound.

**Next Steps**

GBC's consultation on the Local Plan was based on the proviso that policy A46 was to be deleted in the absence of justification for the location of a secondary school at the site.

The Parish Council has seen no proper justification for the location of a secondary school in this Green Belt site. The selection of the site appears to have been justified on the basis that it will be close to the housing identified in the allocation. This makes for an entirely circular argument; the housing is only put forward on the basis of the school, and the school on the basis of the housing.

This cannot amount to an exceptional circumstance for the release of land from the Green Bell. There has been no adequate sequential site assessment for a new secondary school.

In those circumstances, GBC is invited to confirm that policy A46 will be deleted from the Local Plan because the school location has not been justified. The Spatial Strategy should be amended accordingly.

We await GBC's urgent confirmation that the Local Plan will not be proceeding with Policy A46 and that the land in question will remain within the Green Belt.

**Attached documents:** [LP2016-Normandy-L Clarke- Parish.pdf](#) (642 KB)
Evidence

I object to the evidence presented to support the plan as follows: There is no sound evidence in terms of the ELNA 201 which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable; the # of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50% of the new homes could be built on brownfield sites. GBC’s transport assessment was not even available to councillors for the vote taken on 24 May. Infrastructure overload has received scant attention.

Policy P2

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

Policy A43

I object to the proposal to build 400 houses and 7,000 m sq of industrial use and warehousing at Garlicks Arch. There is no need for any more houses on top of those already proposed for the borough. This site is NEW and not included in the Regulation 18 draft and has not been consulted on previously. It is Green Belt permanently protected by the NPFF which prevents merging of the settlements. There are no exceptional circumstances. The site has particular conservation sensitivity as it is covered in ancient woodland. The proposed industrial development of 7,000 sq m is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous plan. If there is a further need for industrial space, then it should be at Slyfield. A new 4-way interchange onto the A3 at Burnt Common would put substantial pressure on the already overloaded Send Road (A247) as it would be the through route for Woking for traffic leaving the M25 and A3 and the proposed new houses at Wisley and Burpham.

Policy A44

I object to the proposal to build 40 homes and two new travellers pitches to the west of Winds Ridge and Send Hil. This site is new and was not included in the regulation 18 draft and has not been consulted on previously. Development for housing is inappropriate due to its permanent green belt status and the beauty of the site. The subsoil of the existing site contains documented unsafe land fill waste which is currently being vented. The proposal to include 2 Travellers pitches is inappropriate due to the narrow width single track road providing insufficient access to the site.
There appear to be very strong grounds for suspecting the validity of the SHMA on which the Housing Requirement is based and which appears to be inflated by unreasonable estimates of student accommodation requirements. I know the Guildford Residents Association have made representations on this point and their findings appear to hold water. I urge you to review the annual target of 693 dwellings which I believe may be over-inflated.

Attached documents:

Comment ID: SQLP16/569  Respondent: 8598049 / Environment Agency (Jonathan Fleming)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

We have comments regarding the evidence base documents:

- Draft Infrastructure Delivery Plan
- Flood Risk Sequential and Exceptions Test

As these are comments regarding the soundness of the Plan we have submitted them in Question 3: Soundness.

Attached documents:

Comment ID: SQLP16/414  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

I have submitted comments on the evidence in statement sent by email. In addition I wish to raise a set of questions on the transport related evidence. These are queries asked during the consultation period which I was advised to submit via this questionnaire.

A Strategic Highway Assessment

A1 In the SINTRAM network, how many kilometres are there of each class of road?

A2 Please provide the totals for trips as follows for the AM and PM peak for 2009, Scenario 1 and Scenario 2

   i) intra-borough  ii) external to borough  iii) borough to external

A3 There are marked differences between peak arrivals and departures in the AM and PM peaks. Table 3.5 shows for Scenario 2 Am pk arrivals of 1,850 and PM peak departures of 3236. Why the large differences? The response by email on 1 July does not answer the question.

A4 Table 4.13 shows outward cross-boundary impacts. Please provide the equivalent for inbound.

A5 Please tabulate link flows and RFCs for Scenarios 1 and 5 for all the links listed in Tables 4.3, 4.4, 4.5 and 4.12, for the AM and PM peaks

A6 Please tabulate junction delays for all the junctions in Tables 4.8, 4.10 and 4.11 for scenarios 1 and 5 for the AM and PM peaks.
A7 In Scenario 5 the RFC for the M25 J10-11 is 1.0 (Table 4.5) what is the link speed for this case? The A3 has an RFC of 1.10 in Table 5. What is the corresponding link speed?

A8 What is the total number of trips (i.e.2009) to which the extra trips in Tables 3.5 were added?

A9 There are no additional trips in Tables in 3.3 and 3.5 for zone 552 Slyfield Residential which is a zone with a large housing development in the Plan. Is it that case that extra trips should be added to rectify an omission?

A10 Does the version of TEMPRo used for external growth take account of the planned development in Rushmoor called Wellesley (Aldershot Urban Expansion)?

A11 The trips to and from town centre zones in Scenarios 1 and 2 show a marginal increase over 2009 in the AM peak, and a reduction compared to 2009 in the evening peak. I have classed the following as 'town centre zones': 133,134,135,136,310,540,541,545,543,544,547,548,549,550. The combined increase in the AM peak trips is 90, and the reduction in the PM peak is -341. This is difficult to reconcile with the scale of growth of the town, including the centre, with increased housing and major retail expansion.

**Attached documents:**

**Comment ID:** SQLP16/523  **Respondent:** 8599201 / Richard D Jarvis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

The Strategic Highway Assessment Report explains that the distribution of the additional trips generated and attracted to new developments was based on 2011 Census data, with the exception of Wisley Airfield development.

While this is a pragmatic way of dealing with the matter, it is a simplification in that the distribution is not influenced by either the new developments of the traffic conditions on the network.

**Attached documents:**

**Comment ID:** pslp17q/114  **Respondent:** 8599201 / Richard D Jarvis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

See attached paper with comments on

Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report

Doc Ref T13 Transport Strategy

Topic paper : Transport

[text of attachment reproduced below]

**Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report: high level review of potential key changes in the Guildford borough PSLP: strategy and sites June 2017**
1. This presents a qualitative assessment of the effect of the changes made to the 2016 plan on traffic forecasts. Essentially, because the amount of development in the plan has been reduced, GBC’s argument is that things will be better than estimated in 2016. We can readily agree that where development sites have been removed, notably as in the case of the Normandy/Flexford strategic site, the forecast traffic level will be lower in the vicinity of the development. However, there are some sites where the planned development is now greater than in 2016. There are also potential changes to plans outside the borough to be taken into account, such as Dunsfold Park, which may have significant consequences for Guildford, as was pointed out by SCC and GBC in their submissions to Waverley in response to that planning application. The trip rates used in the forecast assume a level of public transport use and an appropriate level of bus services.

2. On the evidence provided by the SHAR based on the 2031 traffic forecasts using the SCC traffic model, congestion will be widespread in peak periods across much of the highway network, including on strategic routes. The A3 and M25 are forecast to be at or over capacity. The cumulative effect of the additional traffic generated by the developments in the plan will be to increase congestion, even with the proposed highways schemes in place. Interpreting the model results is not straightforward, as was pointed out in response to the 2016 consultation. Table 4.12 is significant – showing the roads with the ten largest ratios of flow to capacity for Scenario 3, which includes all the planned development but not the major strategic route improvements on the A3 and M25. There is no equivalent for Scenario 5 (i.e. with the strategic improvements), but we can infer that all the roads in Table 4.12 will be at or over capacity in Scenario 5.

3. With regard to the comments on Policy A6: North Street redevelopment (page 9), the model used for the Strategic Highway Assessment is not sufficiently detailed to provide a satisfactory assessment of conditions on the town centre road network. This has been recognised by GBC and has led to the commissioning of more detailed analysis using a simulation model. Added to which, there is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the draft Town Centre Regeneration Strategy, which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of such a reduction will be far-reaching.

4. 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.

5. The improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 S-bound carriageway, nor an understanding of the implications of the SMC for the allocation of highway capacity on the local roads. What is self-evident is that the pressure on local roads in Burpham is already intense in peak periods, and these roads are not suited to carrying large volumes of traffic. Under the plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demand to the A320 and roads in Jacob’s Well.

6. The change to Policy A29: Land to the south and east of Ash and Tongham involving more houses means that there will be more traffic locally. While this will not be ‘major’ in terms of the borough as a whole, it will be significant locally. Ash and its surroundings will be impacted by the large Wellesley expansion in Aldershot. It is not clear to what extent the modelling reported in the SHAR allowed for this development. The pressure on the A331 and the roads connecting Aldershot to Guildford and Woking will increase.

7. The M25 is forecast to be at capacity after the planned improvements have been introduced, as shown both in the SHAR and also in the recently published DfT/HE report on the South West Quadrant. This is relevant to Policy A35 Wisley airfield. It should be noted that RHS Wisley is expanding its facilities with the aim of significantly increasing visitor numbers. The DfT/HE Stage 3 report concludes that the focus should not be on widening the existing road further beyond currently planned schemes but on how to reduce pressures and provide parallel capacity to relieve this part of the network. If the M25 and A3 are at capacity, then the Wisley development will add pressure on local roads that are not...
well-suited to carrying higher volumes of traffic. This is also relevant to the proposed developments at Burnt Common. The consequences for Ripley are likely to be serious. It is noted that Policy A35 now includes a requirement for mitigation of impacts in Ripley and on surrounding roads, which is some recognition that there will be a problem.

8. A comprehensive up-to-date analysis is required to inform decision-making. This should include analysis of the mid-term stage of the plan, before the A3 improvement is complete, as well as 2034.

**Doct Ref T13 Transport Strategy**

9. Section 1 Overview. The description of existing conditions and challenges is broadly correct and welcome.

10. Section 2 Surface access to airports. The problem is that the improved A3 will be at or over capacity in peak periods under the Plan, and the M25 SW Quadrant study has concluded that the M25 will be overloaded. So surface access to Heathrow from Guildford will continue to be affected by the weaknesses listed in this section.

11. Section 3 Rail. This section is welcome. However, it is noted that Crossrail 2 has not yet been secured.

12. Section 4 Strategic roads. Surely the strategy should be aligned with the position of Highs England set out in the Topic Paper: Transport, where it is evident that the improvement of the A3 will not be completed until 2026/27, or even 2027/28? The removal of schemes SRN1 and SRN6 from the list of key infrastructure for the plan, and redesignating them as ‘aspirational’ is inconsistent with the safety objectives of the borough and surely of Highways England and Surrey County Council (the highway authority). Under the strategy and the Plan, the issues for Beechcroft Drive and the weaving and merging issues on the existing A3 will not be addressed until half way through the plan period.

13. Section 5 Local roads. While welcoming the aspiration to transform the town centre, the traffic implications have not been dealt with in the strategy or the Plan. Section 1 correctly included the issue of “severance of the town and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey”. The case for a new crossing of the river and railway, relieving pressure on the Farnham Road railway bridge and helping to achieve a better environment on town centre roads, should be taken very seriously and examined in depth. There is a real risk that a significant reduction in capacity in the town centre, both the gyratory and Walnut Tree Close, and on routes carrying the SMC, will lead to road users transferring to minor roads around the town that are unsuited to carrying more traffic.

14. The M25 SW Quadrant study report recommends that alternative routes are developed to carry orbital traffic, and this could mean more use of the A31/A331 in Guildford. There are local roads where capacity is already an issue and planned growth will add to problems that are not mentioned in this strategy. The scope of this element of the strategy is not wide enough. The bus transit strategy is welcome. However, there is insufficient information on the Sustainable Movement Corridor to gauge either what it might deliver or its potential impact on road capacity. The statement under ‘Anticipated improvements’ that the New Sustainable Movement Corridor provides rapid and reliable bus journeys in Guildford urban area and links...’ has not been demonstrated. Consultants have been carrying out studies but the results have not been made public in time to inform this consultation.

15. A high quality bus station in the town centre is critical for the future of the town. There is a lack of park and ride on the east of the town and not even an aspiration for future provision.

16. The active modes strategy is welcome. However, many roads in the borough are two-lane carriageways of restricted width, with little scope for allocating space for cyclists, and this has to be either accepted or addressed over the long term.

17. Section 6 Air quality. If traffic is going to increase in aggregate, as the forecasts show, even with the measures being proposed, then air quality will continue to be a concern.

18. Section 7 Road safety. The proposals are welcome, but as stated above, the schemes SRN1 and SRN6 should be reinstated in the Plan for safety reasons.

20. This is a helpful paper providing context and background to the transport aspects of the Plan.

21. The fact the new supplementary technical work is planned to be carried out prior to the submission of the plan to the Secretary of State (para 3.18) is welcome, but it would have been better if the results had been available for this consultation.

22. It is recommended that the wider evidence base should be expanded to include the following:
- Local Enterprise Partnerships and Local authorities: Influencing Strategic Transport in the South East, WSP, 2016
- Surrey County Council: Response to Waverley borough Council on WA/15/2395 Dunsfold Park, Dec 2016
- Guildford Borough Council: Guildford Town Centre Highway assessment – Town Centre Highway Layout Concept Testing, WSP, April 2016

Attached documents:  Comments on transport evidence, rdj4, 24.7.17.pdf (94 KB)

Comment ID: pslp17q/163  Respondent: 8599201 / Richard D Jarvis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Answer: (Yes)

The evidence presented on housing need in GLHearn's Guildford Addendum to the SHMA (March 2017) is flawed. The explanation of why it is flawed is set out in the report prepared by Neil McDonald for Guildford Residents Association - Review of GLHearn's Guildford Addendum, July 2017. (This report has been peer reviewed.) There are strong grounds for revising the OAN downwards, which would have fundamental implications for the Plan.

Attached documents:

Comment ID: pslp17q/165  Respondent: 8599937 / Development Planning Consultants (Richard Cooke)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Answer: (Yes)

The evidence base is acceptable.

What is not acceptable is the analysis of that base. In particular the Green Belt and Countryside study assesses GB and its fundamental principles and produces a hierarchy of sites where GB releases might be considered. The policies that you are deriving from this study do not take into account the work of that study. The major releases at Gosden Hill, Wisley, Blackwell Farm and Garlicks Arch will produce a ribbon of development almost the entire length of the Borough. The public perception of the national protection afforded by the London Green Belt (whilst travelling on the A3 for example) will be of a continuous built up zone. The LAA base reflects developer submissions and not an independent planner led assessment of suitable sites.

Attached documents:

Comment ID: pslp17q/480  Respondent: 8601537 / Downsedge Residents' Association (Rosemary Morgan)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Answer: (No)
Downsedge Residents’ Association supports the evidence provided by Guildford Residents Association, namely the “Review of GL Hearn’s Guildford addendum to the West Surrey SHMA”, produced by Neil McDonald (attached alongside this document). In particular, we are concerned that:

- The population forecasts produced by the Office for National Statistics (ONS) significantly over-estimate the district’s population and hence future housing need, due to the under-recording of students leaving Guildford at the end of their studies. The housing need figures have therefore been over-estimated by the use of invalid population forecast.
- Despite the Objectively Assessed Housing Need (OAHN) figure having been reduced from 13,860 homes in total (2013-2033) to 12,426 homes in total (2015-2034), since the earlier draft of the Local Plan, this revised figure, of 654 new dwellings per annum, is still substantially higher than the typical new housing figure achieved for Guildford over recent years.
- This ambitious new housing figure also relies on building on Green Belt land at a number of locations, including the strategic sites of Gosden Hill Farm and Blackwell Farm and a new settlement at Wisley.

- While we were pleased to see some reduction in scope of both the Gosden Hill Farm and Blackwell Farm developments, we were disappointed that the figure for new homes in the urban areas remains little changed at 3,000 units. We would have preferred to see a substantial increase in the use of brownfield sites within the Guildford urban area and a subsequent reduction in the use of Green Belt land, not only in order to protect our valuable Green Belt, but also, to reduce the impact of new housing development on increased traffic congestion (an issue addressed elsewhere).
- While the Plan acknowledges that new infrastructure will be one of the benefits of the new large strategic greenfield sites, we would have preferred to see some improvement in infrastructure take place before the development on these new greenfield sites, in order to address existing issues, especially on transport infrastructure. In relation specifically to transport infrastructure, and the Guildford Borough Transport Strategy, 2017, Downsedge RA has a number of concerns, including:

- If the Dunsfold Park development of 1,800 homes goes ahead, the main access to this site from the north would be the already congested A281, through Guildford town centre. The only improvements to the A281 in the Local Plan are some improvements to the Shalford roundabout (A281 / A248), which are probably required anyway. Downsedge RA would like to see further improvements to the A281 into and through Guildford, in order to reduce the likelihood of increased traffic through Chilworth and into to Guildford via Halfpenny Lane, One Tree Hill Road and Tangier Road (a well-known rat run).
- The traffic on the urban section of the A3 through Guildford regularly blocks to a complete standstill, and when it does so, traffic tends to exit either at the A322/A323 Wooden Bridge Roundabout (northbound) or at the Burpham exit (southbound), causing congestion in and around the north and west of Guildford, and often through much of the town centre. Downsedge RA believes that this issue needs to be resolved.

Attached documents:

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<th>Comment ID: SQLP16/1033</th>
<th>Respondent: 8604321 / Barton Willmore (Simon Potts)</th>
<th>Agent: Associate Vail Williams (Chris Wilmhurst)</th>
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**Site A16 Land**

**at Gill Avenue**

Do you consider this section of the plan is legally compliant? Yes

Do you consider this section of the plan is sound? Yes

Do you consider this section of the document complies with the Duty to cooperate? Yes

The A2Dominion Group has a ground lease on land within site Policy 16. A2Dominion are supportive of the proposed allocation for Policy A16 and A17. It is a core principle of the Group to continually look to improve their accommodation and services across all of its sectors which include key worker, student, social and market accommodation. Policy sites A16 and A17 provide the potential to provide high quality key worker accommodation for the hospital’s need, and much needed market accommodation. The A2Dominion Group in principle would support collaboratively working with Royal Surrey County Hospital to explore opportunities to improve the existing environment within the site.

A proposal that could incorporate strategically relocating existing key worker accommodation for hospital staff, and indeed potentially increasing the quantum of such accommodation is something A2Dominion wholly support, as it also provides the opportunity to deliver the highest standard of modern accommodation going forward. This is key for attracting and retaining the highest quality of staff for the hospital for the services and care it provides for the local community.

If you are proposing a change to the Proposed Submission Local Plan: strategy Yes No and sites, do you wish to express an interest in participating at the Examination? Yes

Why do you wish to participate at the Examination?

It is important that A2Dominion are represented at the Examination in order to support the identification of the site for development, confirm the land is available and developable to enable the allocation to proceed with confidence and provide evidence on any general matters regarding the site which may arise at the Examination.

**Site A17 Land**

**south of RSCH**

Do you consider this section of the plan is legally compliant? Yes
Do you consider this section of the plan is sound?  Yes

Do you consider this section of the document complies with the Duty to cooperate?  Yes

The A2Dominion Group has a ground lease on land within site Policy 16. A2Dominion are supportive of the proposed allocation for Policy A16 and A17. It is a core principle of the Group to continually look to improve their accommodation and services across all of its sectors which include key worker, student, social and market accommodation. Policy sites A16 and A17 provide the potential to provide high quality key worker accommodation for the hospital’s need, and much needed market accommodation. The A2Dominion Group in principle would support collaboratively working with Royal Surrey County Hospital to explore opportunities to improve the existing environment within the site.

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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?

It is important that A2Dominion are represented at the Examination in order to support the identification of the site for development, confirm the land is available and developable to enable the allocation to proceed with confidence and provide evidence on any general matters regarding the site which may arise at the Examination.

Attached documents:

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<th>Respondent: 8605921 / Roger Lindsay</th>
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I wish to record that I object to the plan as a whole and to that part that affects me most covering the Horsleys, Effingham Junction, Ockham.

I objected to the previous plan and this revision seems little different; in some respects worse. First it is not really a plan. It is only part of a plan. There is a bit about the "what", a lot about the where and nothing about the "when", "how" and "who".
1. Fundamental Overall Objection

   • Green Belt and AONB

It has been made clear by the Government that they remain committed to protection of the rural environment. When asked to comment on the National Planning Policy Framework, the Minister of State for Housing & Planning Brandon Lewis MP made the following declaration in a letter dated 10th June 2016 to Richard Knox-Johnston, Chairman of the London Green Belt Council:

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

This clear policy statement is not reflected in the draft Guildford Local Plan which calls for housing development not only on a number of sites in the AONB and the AGLV but also encroaches on the Green Belt in a wide range of other locations. CPRE maintains that this is a misguided approach and renders the current proposal unsound. CPRE OBJECTION.

   • Town Centre Capacity

CPRE believes that the draft Local Plan is also unsound because no complete proposal for the Town Centre or for the development of the urban area has been made available in time for this consultation. This is required so that a coherent assessment can be made of the priority given in terms of the extent and type of housing development proposed, its density and location. Town and countryside have to be considered in parallel. CPRE OBJECTION.

   • Green Balance Review of Objectively Assessed Need (OAN)

CPRE Surrey has commissioned Green Balance to review and supply an independent commercial opinion on the validity of the OAN housing figure of 693 given in the GLH Hearn West Surrey Strategic Housing Market Assessment (SHMA)
for Guildford, Waverley and Woking. Their report makes clear that they judge this document to be flawed and the OAN figure for Guildford to be too high. In view of the Green Balance evidence produced, this puts the credibility of the whole draft Local Plan in question. The over estimation of housing need effectively makes the draft Local Plan unsound. CPRE OBJECTION.

Instead of the OAN recommended in the SHMA of 693, an overall reduction is suggested for this figure of 212 which results in a revised OAN of 481. Other areas for further investigation as to the validity of the 693 figure have been suggested. The summary of reductions recommended for the OAN for all 3 districts covered are shown in Table 1 of the enclosed SHMA Review on page 4.

CPRE does not accept that the constraints relating to development in this draft Local Plan have been properly assessed or taken into account. If they were, the OAN would be radically reduced and we estimate that there would be no need to use Green Belt land. GBC has indicated that the OAN figure which GL Hearn has produced takes account of constraints but gives no explanation of how this has been done. This whole topic needs to be investigated further.

CPRE is also not in agreement with the emphasis given to retail sector expansion and office and warehouse development at Guildford at a time of changing conditions in the market-place and a need for more urban housing. CPRE believes that the focus of attention on building in the countryside has been caused by a too high OAN figure and a refusal to allocate sufficient priority to the supply of affordable housing and flats in the town because building development in this category has been sidelined rather than given the attention it requires. CPRE OBJECTION.

Attached documents:

Comment ID: SQLP16/2122  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Section 6: Land Availability Assessment (“LAA”) 2016

We have reviewed the LAA being one of the major elements of the Evidence Base and we have the following observations relating to Shalford Parish.

6.1 Sites within Villages: We note that 8 sites have been identified within the LAA which would fall within the existing settlement boundaries of the villages of Chilworth and Shalford and could provide 59 new homes. If the inset proposal goes ahead as planned by GBC these sites will no longer be within the Green Belt and any such planning application will be addressed as and when they arise and we will have to rely on the provisos in Policy D4 to resist any applications which we feel to be unacceptable.

6.2 Land proposed to be inset: There is only one such site within the LAA which arises from the proposed re-drawing of settlement boundaries being Site 2286 Land at Old Manor Farm, Chilworth. We have commented on this in para 5.3.1

6.3 We note that site reference 1264 being land to the rear of Greenhill/Burnside has been discounted due to Suitability Concerns and its designation as protected Open Space in the Plan. This is very much welcomed, but in addition we would equally welcome a decision that this land should retain its Green Belt status outside the settlement boundary.
6.4 We note that site reference 2295 Chinthurst Farm, Chinthurst Lane has been discounted as “not sufficient evidence
base to demonstrate that it is Previously Developed Land”. This is very much welcomed.

6.5 We also note and welcome the substantial number of “discounted sites” listed on page 544 of the LAA

Attached documents:

Comment ID: SQLP16/166  Respondent: 8640353 / Julian Cranwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission
documents
Answer: (No)

The evidence base is far from adequate. The council is not in possession of the model used to calculate the OAN. Much
of the remainder of the ‘evidence base’ appears to have been cobbled together to support as development agenda, with
insufficient regard to infrastructure needs.

Attached documents:

Comment ID: SQLP16/1310  Respondent: 8640353 / Julian Cranwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission
documents
Answer: ()

We object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent

Key parts of the evidence base are flawed or based on withheld assumptions. The current SHMA inflates the proposed
housing figure due to the following factors:

- the failure to correct for errors in the historical data for international migration flows;
- the way it considers students and affordability, and
- the flaws in the method for estimating the number of homes needed to support job growth;
- the treatment of vacant property

The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look
strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is
not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require
assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Exceptional
circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is
quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban
areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan
is not ready for a Regulation 19 consultation. It is emerging that the Strategic Highway Assessment shows there will be
congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000
homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand
how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses. The
available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow
roads and pinch points. Evidence on bus travel is fundamentally compromised because no clear and workable location for
a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services. The
main line to London is already extremely busy in peak periods. Information about the town centre as regards traffic, buses
and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach. The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained.

The consequences of major proposed reductions in road space in the town centre (e.g. closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford. We believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/886</th>
<th>Respondent: 8655233 / Kay Mackay</th>
<th>Agent:</th>
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<tr>
<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td><strong>Answer</strong>: ()</td>
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1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed and can be found.

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

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1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/349  Respondent: 8659489 / Helen Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

The number of new houses proposed in the Strategic Housing Market Assessment has been generated without any visible evidence or explanation. The numbers are vastly inflated and the forecast population increase in the borough as a whole is 70% higher than the official national estimates for the borough. These inflated numbers become even more inaccurate when looking at individual villages: the proposals for the Horsleys, Effingham and Ripley/Ockham far exceed the number of houses required by the local population. The proposed increases in households in these areas can be as high as 35-50%. It will destroy a semi - rural pocket of Surrey. All on false numbers.

Attached documents:

Comment ID: SQLP16/867  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

24. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be reassessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/324  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

The Strategic Housing Market Assessment (SHMA) is deeply flawed, as has been demonstrated by two separate authoritative studies: Councillor David Reeve's analysis published in July 2016 and the independent NMSS report commissioned by the Guildford Residents Association of June 2016. In turn this invalidates the statement of Objectively Assessed Need (OAN) and negates the basis on which so much development is proposed in the Local Plan. I OBJECT to the entire Local Plan's being predicated on a housing number that rests on a flawed methodology. I also OBJECT to the fact that constraints have not been applied to the OAN to arrive at a more rational housing number. I believe the number in the Plan to be grossly inflated as a result and not a sound basis for planning, especially as using this number has such devastating consequences for the Green Belt.

Attached documents:

Comment ID: pslp17q/173  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (Yes)

I am glad that the revised Sustainability Appraisal 2017 provides a very clear statement of the sensitivity of the land between Normandy and Flexford, which was the previous Site/Policy A46 - now removed from the Plan - and also highlights that it includes Grade 3a agricultural land, falling in to the Environment Agency's "Best and Most Versatile" category.

Attached documents:

Comment ID: SQLP16/985  Respondent: 8703585 / N J Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()
Insufficient data on infrastructure analysts in particular traffic movements and journey times in the area immediately surrounding the proposed development sites in East/West Horsley.

Also, given that HS2 and other major capital projects are being put on hold, following recent government cut backs, how can extensive housing development take place whilst A3 upgrading is by no means certain?

**Attached documents:**

---

**Comment ID:** pslp17q/67  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** (No)

The population basis do not take account of the prospective decline in economic prospects as a result of BREXIT. The assumptions about student numbers appear to assume a large proportion of students will remain in the borough after graduation rather than move elsewhere, as is more likely.

More generally, I object for the relevant reasons in the submissions attached of the East and West Clandon Parish Councils

**Attached documents:**

- [West Clandon_Local_Plan_2017_Response.docx](#) (35 KB)
- [Response East Clandon Parish Council to Local Plan Consultation 2017 14.7.17.pdf](#) (577 KB)

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**Comment ID:** pslp17q/460  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** ()

I object to the evidence base as it applies to Policy S2; because it fails to reflect the deterioration in national economic prospects as a result of the EU Referendum and thus overestimates the need for the provision of housing numbers; because it assumes that a high proportion of students will remain in the borough after graduation rather than is most likely moving elsewhere; and because it encourages development in the South East when it is declared government policy for development to be balanced throughout the country and especially in the northern English regions.

I object to the proposed changes to the plan and evidence produced or updated since 18 July 2016, for all the relevant reasons set out in the submissions of the East and West Clandon Parish Councils.

**Attached documents:**

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**Comment ID:** SQLP16/810  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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Comment ID: SQLP16/388  Respondent: 8717921 / Helen Jefferies  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  

Answer: (No)  

Much of the evidence base is unsound being either incomplete, inaccurate, subjective, inconsistent or in many cases all of the above. The SHMA and LAA are particularly poor pieces of work.

Attached documents:

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Comment ID: SQLP16/1887  Respondent: 8717921 / Helen Jefferies  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  

Answer: ()  

- A concise summary should have been provided

Attached documents:
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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough 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. This local plan and the SHMA number have completely ignored these factors.

Attached documents:

Comment ID: SLP16/624  Respondent: 8729217 / Karen Stevens  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

No I do not agree that the evidence used for the Submission draft of the Local Plan Strategy and Sites is adequate or relevant. The Strategic Housing Market Assessment (SHMA), the Strategic Highways Assessment Report (SHAR), the Sustainability Appraisal and the Green Belt and Countryside Study (GB&CS) are all either flawed, provide incomplete information or information that is not properly used to inform the Plan.

SHMA - I support the commentary on the SHMA provided by Neil Taylor (on behalf of the Guildford Residents Association) and Richard Bate (on behalf of CPRE). Furthermore, I do not believe that residents are being consulted properly on Plan when they have no means of understanding how the objectively assessed housing need has been derived. Without the ability to check this figure (and without any assurance that councillors have scrutinised this), it is impossible to know how many sites are required to meet the borough’s need.

SHAR - The SHAR is very thin on detail. There is no clear indication of how junctions will operate (eg the proposed 4-way junction at the top of the Farnham Road (on the A31)), or which routes new roads will take (eg the proposed link road from the A31 to Gill Avenue). No details are provided about how schemes have been costed (eg the A31-Gill Ave link road and the Sustainable Movement Corridor) or about what other alternatives have been considered and why they were ruled out. I fully support the commentary in the Technical Note by traffic consultant RGP on the proposed access to site A26 (Blackwell Farm), which was commissioned by Compton Parish Council.

Sustainability Appraisal - This appraisal appears to be based purely on grounds of walking distance to a selection of nine facilities. Even within this limited appraisal, there are some oddities: 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. It isn't clear how the Sustainability Appraisal is being used to inform site selection decisions. 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.

Green Belt and Countryside Study - This study is inconsistent and flawed in its analysis. The sensitivity test it uses for determining how effectively a particular site meets green-belt purposes is simply to count how many of the purposes are met. This is too simplistic and gives little consideration to how well a particular function is met. The study also fails to take into account landscape character or environmental factors such as ancient woodland or the setting to the AONB.

The comments made by a member of Save Hogs Back at the Regulation 18 consultation were ignored.

Attached documents: GBCS Feedback Local Plan (4).pdf (2.3 MB)
Comment ID: SQLP16/536  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

SHMA- OBJECT. No calculations available. No scrutiny in Council. No constraints applied.

OBJECT- No mention of recent AONB review.

OBJECT- LAA sites added from last consultation.

OBJECT- NO data available for Local Housing Needs Assessment. Nothing about this mentioned at Worplesdon Parish Council so not sure what GBC intend to do?

OBJECT- Retail and Leisure. Guildford do not need more retail space. Retail is declining as people shop online.

OBJECT- No update for Rural Economy, LAA and SNCI data.

On the whole a very shabby collection of rushed work without the dat to support it.

Attached documents:

Comment ID: SQLP16/1028  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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<th>Comment ID: SQLP16/1531</th>
<th>Respondent: 8735873 / David and Gillian Allan</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<th>Respondent: 8744417 / Mark &amp; Gillie Hammersley</th>
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Attached documents:

**Comment ID:** SQLP16/1164  **Respondent:** 8749089 / Anthony Hatton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

It is our view that this is not a robust piece of work. Some of the assumptions have been withheld and we would suggest key elements are missing or the assumptions flawed. A prime example heroes that we would suggest that the Housing Market Assumptions exaggerate the demand, The Greenbelt and Countryside Study approach is suspect and the Transport evidence is much too late and lacking in essential features to contribute to a sound and comprehensive local plan.

The OAN has also not been produced to the desired standard and we would suggest that in this regard a figure of 693 dwellings per annum is too high. Again, we would refer you to the work carried out by the GRA whose independent report came up with a figure if 500 dwellings pa which appears to be more realistic. This report also concludes that there were errors in the SHMA. For example the changes in population shift in Guildford are not the same as for other boroughs in Surrey given the student base and that it would be sensible for student movement to have been considered separately.

It is also extremely surprising and certainly disappointing that the current and increasingly poor traffic problems in Guildford, given the forecast population growth, has been given such scant regard in the Submission Plan. There is no doubt, in our mind, that failure to take a more meticulous and well thought through approach to our traffic issues will cause significant constraints in the growth of high skilled jobs and a boost to our economy in the high tech sector. In summary our town’s infrastructure as currently planned, will just not support the growth in future housing. Lastly, whilst on the subject of traffic, we find it hard to understand what, if any measures, are being taken to actively manage “pollution” problems both in terms of emissions and the noise level from the traffic on the A3 which has become an increasing blight to residents.

One of the reasons we chose to live in Guildford was not only the historic nature of the town but also its setting in the Surrey countryside. The plan as currently drawn up will certainly impinge on these desirable characteristics with the Green Belt boundaries being redrawn yet again and insufficient account has been taken of the “fundamental aim” of the Metropolitan Green Belt.

To our mind Guildford is more than adequately provided for in the provision of retail. It is our view that further development in this area should be scrapped in favour of more appropriate residential units in the town centre which would provide a more conducive environment for residents and visitors alike.
The evidence base is in many respects out of date. The SNCI and Landscape Character Assessments both date from 2007. Neither address the critical strategic sites in this local plan. They are therefore almost useless. The HRA was commenced after the first draft was issued and remains superficial and incomplete. Again it does not address the critical strategic sites in the local plan. It sweeps these aside with *ex cathedra* comments that the HRA is not relevant to issues such as the Green Belt. The Thames Basin Heaths document had actually expired - running out in 2014. Instead of re-visiting the issues the Council simply re-dated it. The engagement with Natural England has been superficial - and simply seeks NE's endorsement rather than seeking to form an authentically evidenced and reasoned perspective.

The Green Belt and Countryside Study is out of date. Moreover it was commissioned with an explicit intention to roll back the Green Belt to facilitate the political intention to turn Guildford into a 'growth hub'. The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

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Attached documents:

Comment ID: SQLP16/218  Respondent: 8749793 / David Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

8/ I object to the lack of definition between this draft and the previous, withdrawn, draft. There is no clear indication of the changes to accommodate the 20,000 comments. The inadequate and often subjective documents tendered are full of inconsistencies such as the Green Belt and Countryside Study. We are given only weeks to study and comment on a huge amount of documents which GBC have had 2 years to prepare.

In summary this local plan takes no account of local needs (especially housing), local responses to the previous plan and disregards the imperatives of the Green Belt policies, the NPPF and Government advise on transparency and clarity. The fundamental premises upon which it is founded are factually incorrect, based on mysterious modelling and do not include any policies which do not fit its solution. To build an effective Local Plan on such poor foundations will ensure its collapse.

Attached documents:

Comment ID: SQLP16/1023  Respondent: 8752097 / Lucy Meade-King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I have previously indicated my concern that the complexity and volume of information makes this type of consultation difficult and inaccessible to anyone who is not a planning expert or a developer with the resources and a vested interest in pushing certain proposals through

Attached documents:

Comment ID: SQLP16/70  Respondent: 8766945 / Liz Machtynger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I do not believe that the evidence base is correctly calculated. The growth predictions for the borough are not in keeping with the rest of the country or the historical growth. There are assumptions that this areas MUST take this amount of growth and I do not agree that this is correct. The greenbelt policy clearly states that it should only be altered in exceptional circumstances and not where demand for housing is the only factor.

Attached documents:

Comment ID: SQLP16/1483  Respondent: 8769793 / Laura Richards  Agent:
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**Attached documents:**

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**Comment ID:** SQLP16/852  **Respondent:** 8771233 / Ranald Mackinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

**Comment ID:** SQLP16/928  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

24. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Surrey Chambers has supported the Borough throughout the process of securing a sound plan. This note is to extend that support by writing to again to re-enforce the Chamber's support for the current pre submission plan in its final Section 19 consultation.

Guildford is an important town in Surrey, termed a growth town by the EM3 LEP, where the University of Surrey and its Park are located that are an important part of the economy. The Borough needs to secure an adopted plan to enable its business community to continue to have a clear planning landscape to ensure that they can lay down Investment plans.

I am writing on behalf of the Chamber to add to our existing support for the Borough in delivery of its plan. In specific terms, this support is for:

- Planning the provision of 13,680 houses across a range of tariffs and tenures
- Improvement of the transport infrastructure in the town
- Help in supporting the educational base in the town
- Provision of additional land for the growth of employment
- Recognition of the importance of the employment base in the Borough which needs support if its strategic role is to be met fully
A plan which

- Meets national planning policy
- Has been subject to intense scrutiny
- Has the support of the elected members of the council
- It is important to put in place a sound plan that can be used by the community at large, organisations such as the LEP and by business themselves to support further investment in the town.

Please register this support, which reflects a broadly held view by business.

Attached documents:

**Comment ID:** SQLP16/1828  **Respondent:** 8794753 / Andrew Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

**Comment ID:** SQLP16/1136  **Respondent:** 8798849 / David Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/1511  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

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Attached documents:

Comment ID: SQLP16/765  Respondent: 8801473 / Jerry Keane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I wish to register my objection to aspects of the above submission, as follows.

I believe the SHAMA is out of date and needs to be reviewed and reflect Brexit, which I assume would show a significant reduction in the requirement.
and therefore reduce the need to build on Green Belt.

**Attached documents:**

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### Comment ID: SQLP16/1032  **Respondent:** 8803841 / Wellesley Theodore Wallace  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

The evidence base is excessive in volume and is inadequately indexed and sign-posted. This makes it difficult to know where potentially relevant material is to be found. This is particularly serious given the short time limit for comments. Most of the material is only to be found on the Council’s website which is effectively inaccessible to anyone who is not fully computer literate which is the case with most older people. The maps are particularly difficult to follow; an example is the Policies Map of page 322 of the Local Plan where the colouring is not clear even in the printed version which cost £25. In order to achieve the meaningful and proactive engagement required under NPPF para 155, the Local Plan and the evidence base should be clear, concise and selective. The way in which the material has been presented makes it difficult even for a lawyer to distinguish the wood from the trees. Following the referendum much of the material is no longer up-to-date.

**Attached documents:**

---

### Comment ID: pslp17q/384  **Respondent:** 8803841 / Wellesley Theodore Wallace  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** (No)

The SHAR is not up to date, the model base years being 2009. Development under the plan would generate significant extra traffic on the A247 through West Clandon, the only road between London Road, Guildford, and the M25 with a bridge over the railway via Cobham. Congestion at the A3/M25 intersection at Wisley causes many vehicles to use the A247 to avoid the M25. There should be a traffic census on the A247.

The Green Belt study (2013-15) states that Send Marsh and Burnt Common has a good bus service; the bus service from there through West Clandon including Clandon Station was reduced in Sept 2016; there are now only six buses a day mostly at two hour intervals. There is no longer a no. 40 bus. Only 100 vehicles leaving 400 houses at Garlicks Arch at AM peak is not audible. (SHAR Take 3.3)

**Attached documents:**

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### Comment ID: SQLP16/778  **Respondent:** 8804417 / Vivian and Philip Markley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

1. Housing Numbers
The plan for new houses is based on a flawed assessment based around a Strategic Housing Market Assessment (SHMA) which itself is incorrect. If it were to be enacted it would mean a population increase more than 70% higher than the official national estimates for population growth in the borough. This must be rejected.

Attached documents:

Comment ID: SLP16/460  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

The evidence base is poor, with the results of various studies being produced to favour a pro development agenda, in line with the council's stated policy of "rolling back the green belt". One study that was particularly bad was the Green Belt and Countryside Study by Pegasus, especially Vol IV. The attempt at an update to this following earlier criticism was a charade. It was an entirely subjective report, and for a topic as important as this, objective methods should have been used. Green belt boundaries elected for inset areas were weak, and do not meet the requirements of the NPPF. This report has no place in the evidence base, it should be in the recycle bin.

Similarly, the AECOM report Employment Land needs Assessment was poor. It showed a selective use of statistics, to exaggerate the growth of Guildford's economy. It concentrated on only two employment sectors and barely commented on the predicted substantial decline in employment in retail and the impact this would have on overall employment. Worst of all, it was entirely unambitious in the use of employment land, suggesting Guildford should only use employment land with an average (across the country) efficiency. Guildford needs to be much more ambitious in its use of all land, not just employment land. The addition of 120 houses to the housing target to supply workers for the expected increase in employment in Guildford is a fantasy, and these should be removed.

Another report that was very poor was the SHMA. GL Hearn may have produced a large number of reports on this topic, but it seems this has made them complacent. They paid no attention to the suggestion that the ONS make concerning the use of their projections when producing housing estimates - that the underlying trends be understood. In Guildford's case this should have meant that the increase in student numbers was recognised and this effect removed from their calculations. As GL Hearn did not do this, the result was an estimated housing need which was grossly exaggerated - and to add an additional 25 houses for students to the target showed a complete lack of understanding of the basic numbers, as students were responsible for more than 50% of the population increase over the period measured by the ONS. Finally, the addition of 31 houses to promote affordability shows a total lack of understanding of the housing market. High prices are not just a consequence of supply and demand. In the 10 years, 2001 to 2011, the local supply of houses was greater than the demand for houses in the borough (based on the population increase) but house prices almost doubled during this period. High prices are a consequence of many factors. This report was poor quality.

Overall, the quality of the reports in the evidence base is poor and represents poor value for money - they were paid for by local council tax payers. There needs to be a recognition that reports should be properly scrutinised before they are accepted, or introduced into the evidence base. These poor quality reports should not be the cornerstone of the Local Plan.

Attached documents:

Comment ID: SLP16/703  Respondent: 8808321 / Ian Peacock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()
I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

Attached documents:

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<th>Comment ID: SQLP16/892</th>
<th>Respondent: 8810113 / Louise Stewart</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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1. **Questions posed by Guildford Borough Council as part of its consultation.**

Questions from GBC

24.A. **Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.
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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

I object to policy S1

AFFORDABLE HOMES ?????
<table>
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<tr>
<th>Comment ID: SQLP16/744</th>
<th>Respondent: 8817537 / Kim Meredith</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer:</strong> ()</td>
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I object to industrial development at Garlick’s Arch (A43) as it is not required. Latest ELNA shows a reduction of 80% required from the previous draft plan. Any industrial development may be built at Slyfield where there is room for it and it already has the infrastructure in place.

**Attached documents:**

<table>
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<tr>
<th>Comment ID: SQLP16/745</th>
<th>Respondent: 8817537 / Kim Meredith</th>
<th>Agent:</th>
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<td><strong>Answer:</strong> ()</td>
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I object to the SHMA proposed 693 houses per year built – this is more than double previous figures.

**Attached documents:**

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<th>Comment ID: SQLP16/723</th>
<th>Respondent: 8817601 / A. L Thain</th>
<th>Agent:</th>
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<tbody>
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RE: Objections to the Guildford Borough Council Local Plan Proposals for West Horsley

I strongly OBJECT to he current proposals on the following grounds:-

As the country has voted to leave the EU, the Guildford Borough Council's Local Plan proposals are now void as the large numbers of legal immigrants from within the EU will now be greatly reduced. Therefore the evidence base that has been used is now incorrect due to the decrease in the number of people that will settle in this country in the future.

**Attached documents:**

<table>
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<tr>
<th>Comment ID: SQLP16/1819</th>
<th>Respondent: 8818625 / Beth and Frank Fuller</th>
<th>Agent:</th>
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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/1552  Respondent: 8820353 / Gillian Beaton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/270  Respondent: 8820929 / A J Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I Object to the 2016 local Draft Plan

I wish to record my strong objections to the Draft Local Plan which is out for public consultation currently.
I cannot comprehend how the council seriously considers that local residents, communities, interested parties are going to be able to read through, analyse and subsequently comment comprehensively on a document in excess of 1,800 pages (which is not user-friendly in the least) within a six week period! This is totally ridiculous and cannot be considered to be a "fair" consultation in my view, particularly given the massive impact that this plan will have on the borough's planning decisions right through to 2033.

Attached documents:

Comment ID: SQLP16/780  Respondent: 8821025 / Karen McQuaid  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Site 2177 – I OBJECT to the proposed removal of Fangate Manor from the Green Belt and its inclusion within the Settlement Boundary. There are no exceptional planning circumstances to justify removing it from the Green Belt and changing the Settlement Boundary in no way enhances the defensible nature of the Settlement Boundary. It just means moving the boundary from one hedgerow to another and leads to the loss of Green Belt and agricultural land.

There is an ERROR in the Land Availability Assessment dated February 2016, page 299, which shows access to Fangate Manor from Manor Close. Manor Close is a private road and access will not be granted. The road and verges are very narrow and not suited to any growth in traffic.

Attached documents:

Comment ID: SQLP16/159  Respondent: 8824833 / Stephen Stuart-Matthews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)


The sources are used in this document are very limited and the data presented in terms of the anticipated visitor demand is consequently weak, out dated and misleading. The dramatic level of growth in visitor numbers to the Guildford area is completely underplayed and the pending severe shortage of hotel rooms outside Guildford town centre is ignored. Consequently the document provides an inadequate basis from which to develop planning policy for hotels outside the centre of Guildford.

The study fails to mention the rapid growth in visitor numbers to the Guildford area from 2011 to 2016 to visit attractions in Guildford and nearby areas. The true and actual picture is one of rapid growth in numbers to visitor attractions with numbers set to double in the decade from 2010 to 2020

For instance visitor numbers for RHS Wisley presented in the referenced document do not go past 2011. Wisley has more visitors annually than all Guildford’s other attractions combined. In 2011 there were as stated about 1.1million visitors to Wisley. In 2015 visitor numbers were actually over 1.7million (see RHS annual report available on line from the RHS). This represents an annual growth rate of 10% for each year since 2011.

No mention is made that Wisley are in fact planning to increase this by another 0.5million over the next 5 years taking this number to 2.2 million as part of RHS development plans. By 2020 the number of visitors will have doubled from that stated in 2011. This has casued and will continue casue increasing demand for hotel rooms outside Guildford a pertinent fact which is not metioned in the docuoment.
Furthermore the report fails to consider that Guildford hotels also host visitors to nearby attractions near to but outside the borough such as the National Trust’s Polesdon Lacey. Polesdon Lacey attracted 346,000 visitors in 2014-2015 a 10% increase over the previous year and is being developed as NTs flagship destination in Surrey.

This overall situation is alluded to but not explicitly documented in The Surrey Hotels Future Study 2015. This study should however be cited as Key Evidence in the 2016 Plan as it is more pertinent evidence than the Visitor Strategy. It states for instance:

- “there is significant market demand and developer interest in the provision of further tourist and business visitor accommodation”
- “the borough is becoming an increasingly popular place to visit, and the number of overnight stays rising, it is vital that more accommodation is provided”
- “the financial and employment benefits associated with tourism and leisure mean that any planning policy supporting the visitor and leisure experience should be closely aligned with the borough’s planned economic growth”
- “there is an undersupply of visitor and business accommodation in Guildford
- “there is market potential and hotel company interest in luxury country, 4*, boutique and budget hotels and serviced apartments in the Guildford area, …there are not thought to be any live development proposals”
- “failure to provide additional accommodation could limit the borough’s ability to host future events and reduce its appeal as a business and visitor destination, thus stemming the growth of the visitor economy. Conversely, the recent trend in conversions of guesthouses and hotels to residential and other uses may worsen the existing undersupply of bed spaces in the borough”.

This information should be updated in the Plan so that key decisions such as whether to allow the conversion of an existing hotel in the north of the borough to housing can be better informed.

Attached documents:

Comment ID: pslp17q/178  Respondent: 8824833 / Stephen Stuart-Matthews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (Yes)

The evidence supporting the forecast demand for housing in Guildford to 2034 is out of date and now significantly overestimates the likely population growth and therefore housing need in Guildford Borough. The cumulative population growth forecast of 15% to 2034 is driven in Guildford (according to the West Surrey Strategic Housing Market Assessment Sep 15) by settlement of international migrants age 20-30 years. Other factors affecting population growth and decline are largely in balance and taken together will not lead to significant overall growth according to the evidence in the report.

This forecast was published before recent changes were made to Government policy on immigration which during the period considered will directly limit the ability of international migrants (especially students) to come to and permanently settle in the UK including in Guildford. If Government immigration targets are wholly or partially taken account of in the Evidence Base then the forecast growth in local population to 2034 should in fact be in the region of 3%-8% total. Consequentially the demand for new housing units is likely to be in the region of 2500 to 7500 and not 12496 as set out in the Plan.
See the attached file which provides comments on the evidence in the West Surrey Strategic Housing Market Assessment September 2015. It provides more detailed comment and quantified estimates of revised population growth forecasts based on the Government’s latest policies for international migration following the BREXIT referendum in 2016 and including the Conservative Government policies as set out in the 2017 election manifesto.

For the above reasons the West Surrey Strategic Housing Market Assessment Sep 2015 is already out of date. The population forecasts therein relating to Guildford must be updated to take account of revised immigration forecasts to Guildford post BREXIT before the local plan can be based on it. The 2015 forecasts used in the local plan are based on immigration patterns arising from Government policies pre BREXIT and pre 2017 election. Therefore as they stand both the evidence and the Local Plan are fundamentally flawed.

[Text of attachment reproduced below]

**Comment on Guildford Local Plan regarding Evidence base for Population from West Surrey Strategic Housing Market Assessment September 2015**

The evidence base underpinning the 2017 GUILDFORD LOCAL PLAN is out of date and fundamentally flawed. The NPPF requires Guildford to base its development plan policies on up-to-date and relevant evidence. The population of 167126 quoted for 2033 in section 2.3 is an over estimate. It is more likely to be in the region of 150,000-156,000 if government targets on immigration are taken into account for the reasons below.

The housing requirement to be met (with 12,496 new homes) in the Guildford 2017 Plan is based on population forecasts set out in the West Surrey Strategic Housing Market Assessment September 2015 (WSSHMA2015) covering Guildford, Waverley and Woking. This report was compiled before the BREXIT referendum took place in 2016 and before the consequent decision ratified by UK Parliament to leave the EU. The report therefore does not take into account the likely impact on Guildford’s population growth of BREXIT or the Government’s subsequent commitment in its 2017 election manifesto to reduce migration into the UK to “the tens of thousands”.

The summary conclusion in table 13 of section 4.12 of the WSSHMA 2015 is that Guildford’s population will grow by 15% in the 20 years from 2013 to 2033. Following the BREXIT decision this projected growth is likely to be a very significant over estimate.

The WHSSHMA 2015 report section 4.24 shows that all of the growth in Guildford’s population can be accounted for by projected levels of international migration, averaging circa 1240 per year (circa 0.9% per annum) for the 20 years from 2013 to 2033. Figure 18 of section 4.27 shows that this is mostly due to net in-migration of people aged between 20 and 30 years old (e.g. students) settling in Guildford. Other effects on the population of Guildford such as natural growth (births less deaths) and internal net out-migration are projected to balance each other out.

The WSSHMA 2015 report’s forecast of population growth due to international in-migration is in line with UK immigration before BREXIT. For example between 2005 and 2015 gross immigration in the UK averaged 0.9% being circa 570,000 per annum on a population of 62 million. The UK Government’s declared target following BREXIT is to reduce immigration to tens of thousands.

If this target is just achieved and immigration falls to an average of 99000 post BREXIT then the growth due to immigration would fall from 0.9% per annum to 0.15% per annum. Even if the Government’s target is only partially met with an immigration reduction to say 300,000 per annum then this would equate to 0.46% population growth per annum. If these national immigration percentages applied to Guildford (as the WSSHMA Sep 2015 report indicates they would) then the cumulative growth in population in Surrey by 2034 for these two scenarios would be:

1. 0% growth by 2034 if Government target met (e.g. gross immigration of 99000 /yr)
2. 6% growth by 2034 Government target partially met (gross immigration of 300,000 /yr).

The Planning Practice Guidance issued by the Government in March 2014 indicates that the “scale and mix of housing ………. should cater for housing demand of the area and identify the scale of housing to meet this need”. Applying this guidance together with BREXIT population growth projections would indicate that Guildford housing need would be between 2500 and 7500 new units over the next 15 years to meet the above growth projections.
Evidence that this reduction in population growth is now happening has come with 1) substantial drop in applications to UK Universities including Surrey University from foreign students in 2017 and 2) with immigration statistics for 2016 showing the first substantial reduction in net migration in the last decade. In summary the requirement for 12500 new homes in the next 15 years is not likely to materialise.

Attached documents: [Comment on WSSHMA 2015.docx](#) (15 KB)

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Comment ID: SQLP16/316  **Respondent:** 8825409 / Alan Gilbertson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

The numbers of housing units needed appears to be excessive. The evidence is not transparent and the methods of adding up different needs appears to be muddled; in particular there appears to be double-counting.

Attached documents:

---

Comment ID: SQLP16/330  **Respondent:** 8825697 / Online imaging (Peter Gelardi)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

The SHMA figures are incorrect. Produced by consultants who boast about providing inflated housing estimates for developers.

The calculation method is not provided.

Attached documents:

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Comment ID: SQLP16/621  **Respondent:** 8826273 / Chris Holliday  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

The Local Plan is primarily built upon the outcome of the "West Surrey Strategic Housing Market Assessment (SHMA), September 2015". From the resulting housing numbers, flow the needs for land, infrastructure, schools, medical facilities etc.

However, it is not possible to assess, analyse or in any way critique the basis for any of this because the SHMA analysis is confidential. This is a ludicrous travesty of the consultation process and a corruption of democracy. Guildford residents are effectively being given an answer, with no opportunity to understand or challenge how it is derived, and then consulted on the detail of how it is to be delivered.

For the above reason, it is not possible for the consultation process to determine whether the needs have been objectively assessed or whether the Plan is sound.

Attached documents:
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<thead>
<tr>
<th>Comment ID: SQLP16/1573</th>
<th>Respondent: 8826369 / Tim Madge</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer:</strong> ()</td>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

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<th>Comment ID: SQLP16/824</th>
<th>Respondent: 8827777 / Mary English</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer:</strong> ()</td>
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1. **Questions posed by Guildford Borough Council as part of its consultation.**

Questions from GBC

**24.A. Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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Comment ID: SQLP16/653  Respondent: 8827809 / Robert Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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Comment ID: SQLP16/1375  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.
The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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<th>Comment ID: SQLP16/788</th>
<th>Respondent: 8832513 / Richard Russell</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Of major concern is the calculation and quantification of the number of houses proposed in the Strategic Housing Market Assessment (SHMA): a target number that was generated by an external consultant’s mathematical formula of which no qualification or calculation is to be made available. As if this wasn’t unacceptable enough, the consultant’s unsubstantiated calculation has been further massaged by Guildford Borough Council to such an extent as to provide for a population increase across the Borough which is almost 70% above the official national estimates for population growth. WHY?

Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

Attached documents:

<table>
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<th>Comment ID: SQLP16/1185</th>
<th>Respondent: 8835425 / Martin O'Hara</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: ()</td>
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</table>

GUILDFORD BOROUGH – PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2016 CONSULTATION

I write regarding the above and ask that the following comments be taken into account when considering the same.

The points made in this letter are in addition to the points made by Porta Planning in their separate submission on behalf of myself and a group of neighbours.
As you will note, I live in the village of West Horsley and therefore many of my comments relate to the specific issues relating to that village alone.

**GENERAL**

I am well aware of the Central Government desire to increase the United Kingdom’s housing provision, particularly in the South East of England. I believe that I understand the pressure on Guildford Borough Council (“GBC”) to adopt a deliverable Local Plan for the borough for the plan period and that housing provision will form a significant part of the same.

One of the fundamental questions which remain to be fully addressed and adopted is where the most appropriate locations for such dwellings will be. I believe that such housing provision should ideally be situated in sustainable locations; ideally located on existing brownfield sites within the borough and as near as possible to the centres of employment. I do not believe that the current document has given sufficient consideration to the same, seeking instead an over-reliance on the proposed utilisation of the currently designated Green Belt land around local villages, particularly to the east of the borough, to meet such needs.

I believe this to be a fundamental flaw in the Guildford borough Submission Local Plan 2016 (“Proposed Local Plan”) as it proposes extensive residential development that will be remote from the existing centres of employment or where indicated within the Proposed Local Plan; these being largely on the opposite side of the borough. Such a policy would be counter to the principles of sustainable development and would undoubtedly put further pressure on the already struggling transport infrastructure. I would wish to see such this approach rejected and more new proposed housing allocated closer to the existing and proposed centres of employment, i.e. within and around Guildford town centre / urban area, rather than in the borough’s outlying, and previously protected, villages.

That said I would also accept that it is unreasonable to expect that semi-rural villages, such as West Horsley, be totally excluded from any future housing provision. Indeed to promote the ongoing vitality of a lively, prospering village I would anticipate some, but what is currently proposed by the Proposed Local Plan for West Horsley and neighbouring East Horsley is, in my opinion, unnecessary & unneeded, unsupported by infrastructure and disproportionate in extent.

I believe that any such new housing provision must only be allocated having considered many factors, including:

1. Environmental Issues (inc. Green Belt);
2. Housing Need;
3. Local Character & Distinctiveness;
4. Potential Development Sites;
5. Transport & Highway Considerations;
6. Infrastructure;

I will therefore set out my views on each topic with regard to West Horsley below, for your further consideration.

National Planning Policy Framework (NPPF), paragraph 182, advises that a Local Plan can only be adopted if it is sound. As a matter of government policy, soundness requires a plan to be:

1. positively prepared;
2. justified;
3. effective;
4. consistent with national policy.

Within these four heads it should enable, over its plan period, the delivery of sustainable development in accordance with the NPPF.
I have several strong concerns as to whether this is the case within the Proposed Local Plan, as currently drafted, and believe that some of the current policies are neither justified nor consistent with national policy, thereby rendering the same unsound without significant revision.

I therefore **OBJECT to the Guildford borough Proposed Submission Local Plan – Strategy & Sites 2016** as currently drafted.

**Attached documents:**

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**Comment ID:** SQLP16/1749  **Respondent:** 8836129 / Roger Shapley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

Response: NO

The evidence base is not up to date or adequate.

The documents of the evidence base were subject to continuous change without notification and it has been impossible in some cases to track the changes in order to identify significant and material change, making it impossible to evaluate if the change makes the document adequate or relevant. The evidence base was and is not ready for public consultation if there is no way to track what was said previously in so many documents of the evidence base, therefore no basis on which to judge adequacy and relevance to the current draft local plan.

For example, GBCS Vol 4 tables of scores for the contribution of each land parcel to the five purposes of the Green Belt showed one basis of evaluation in the version published in February 2013 and where this failed to support the pre-determination of GBC, the basis of evaluation was changed in the version published in April 2014 reducing the perceived Green Belt protection of the land parcels, making it easier to argue for their qualification as land for housing development. This does not make the document up-to-date as the basis of measurement and evaluation has changed; this is ‘moving the goal posts’ not improving ‘up-to-date-ness’.

The Habitats Regulation Assessment and Sustainability Appraisal were released after the plan was approved by the full council on 25 April 2016. The lateness and content demonstrate the inadequacy with which this plan has dealt with environmental matters. Neither document was immediately available on the website, so early responses sent to the council before these were released could not have taken account of the environmental issues. The Sustainability Appraisal is written by a commercial development company with worldwide reach AECOM and fails to be critical in any way and the document reads more like a public relations release.

The draft SHMAA for Guildford has been proved inadequate. A study of the work of GL Hearn in compiling the housing forecasts to provide Objectively Assessed Need [OAN] by NMSS (sponsored by Guildford Residents Associations of which Normandy Action Group is a member) indicates shortcomings in methodology and lack of rigour in assessing available ONS statistics and misinterpretation of market signals. Therefore, any Policy that claims its content as evidence for the Policy is immediately thrown in to question and suggests it is unsound.

The Settlement Hierarchy evidence has been changed three times, with a second questionnaire submitted to Parish Councils to better record available services. Attempts to conflate settlements as defined by 2003 Local Plan settlement boundaries into small, medium and large villages was abandoned after the methodology was revealed by residents for the sham it was. The transposing of the new questionnaire content has been poor, with errors remaining. Now that the new data fails to match the pre-determination required by the council, the evidence has been quietly shuffled aside and not referred to in detail in the current draft. However, it remains in the evidence base.

The whole process has been one surrounded by obfuscation, with residents having to resort to Freedom of Information requests to obtain essential information freely released by other LPAs e.g. what constitutes ‘exceptional circumstances’. This does not bode well for the Proposed Submission Local Plan to be submitted for examination in public.
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

The evidence base is not up to date or adequate.

The SHMA is inadequate and has been shown to be over inflating the numbers by flaws in the methodology as shown by Cllr Reeve, Guildford Society and Guildford Residents’ Association and by NMSS.

The Settlement Hierarchy - this still has errors.

No Evidence base to support the claims of Exceptional circumstances - a fundamental in the plan with not supporting evidence.
Get it done.

Comment ID: SLP16/667  Respondent: 8852289 / John F. Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object that the Borough Council is using arbitrary figures, produced by G. L. Hearn, (who work for developers,) to propose building nearly 14,000 houses in the Borough. These figures need to be proven.

Attached documents:

Comment ID: SLP16/1059  Respondent: 8857281 / Andrew Backhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I am fine with the housing numbers but feel that Guildford need land provided for a football club.

Guildford city FC have played their football at an athletics ground for nearly 20 years and it is not suitable for football at a higher level.

Attached documents:

Comment ID: pslp17q/490  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)

2 EVIDENCE BASE
2.1 I object to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

2.2 Key parts of the evidence base are flawed or based on withheld assumptions.

2.3 The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

2.4 An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.
2.5 Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

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

2.7 38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Blackwell Farm or Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

2.8 The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

2.9 “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt at Blackwell Farm when the Research Park at adjacent Manor Farm has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

2.10 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

2.11 The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

Attached documents:

Comment ID: SQLP16/1320  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant. The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures. Independent assessments of the SHMA (e.g. from Guildford Residents' Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: pslp17q/216  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)

The strategy in the plan for infrastructure is inadequate as it fails to show how roads in particular will cope with increased traffic in the area; particularly around North East Guildford where more pressure will be put on the A247 through West Clandon, where I live.

The cumulative effect of additional housing at Gosden Hill, Wisley Airfield, the increased light industrial use at Garlycke's Arch and the enhancement of the Newlands corner site will produce massive traffic flow on the A247 through West Clandon which is extremely narrow at a couple of points and reliant on a small hump backed bridge with poor sight lines.

As an employer in Guildford, transport is key to Guildford's continued economic success but there appears to be no detail of improvements provided by Highways England for the A3 in Guildford. It is not right that GBC should provide for additional development when there are no plans for traffic improvement on such a key road.

Attached documents:

Comment ID: SQLP16/1920  Respondent: 8858913 / Stephen Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I have read the objections to the local Plan submitted by David [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] support, and therefore incorporate, the points that he puts forward. Accordingly, on the basis of the above, and of those points, I confirm that I object to the contents of Policies SL, S2, SL, H2, H3, Pl, P2, P3, P4, PS, E1, E2, E3, E4, E5, E6, E7, E8, E9, D1, D2, D3, D4, 11, 12, 13 and 14.

Attached documents:

Comment ID: pslp17q/187  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)
1. I object to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

2. Key parts of the evidence base are flawed or based on withheld assumptions.

3. The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

4. An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

5. Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

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

7. 38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

8. The ELNA states “that a large proportion of the net additional floor space and land requirements for both office/ R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

9. “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

10. Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

11. The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

Attached documents:

Comment ID: pslp17q/517  Respondent: 8865377 / Angus Mcintosh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()

Transport

It is well known there are a number of Air Quality Black Spots on the current Gyratory system, which is why it should go, but GBC have ignored this problem.
It is well known there are a number of Traffic Accident Black Spots on the current Gyratory system, which is why it should go, but GBC have also almost ignored this problem.

It is well known there are proposal to create Modal Shift to encourage pedestrians and cyclists, but with the current Gyratory system it is extremely dangerous and it is impossible to adapt the current roads, which is why the Gyratory should go, but GBC have almost ignored this problem.

It is well know the Cross-Town traffic movements, morning and evening, frequently result in total, or partial gridlock in the centre of Guildford, lasting several hours morning & evening. Modal shift, however welcome (if ever made possible?) will NOT solve this problem.

Nor will any changes to the A3 by Highways England help. Even if funds come forward, these changes with have little impact on Guildford centre traffic, and are unlikely to be completed until 2026-30 at the earliest.

GVG have suggested one solution, which is to build Guildford town centre bypass and a new rail and river crossing, to supplement the ONLY rail bridge built in the 19th century. Why has this idea been dismissed with distain?

Far too much Traffic Assessment by Highway Engineers is based on the Costs of & Improving Traffic Movements/flows - frequently based on out-of-date information, or inaccurate assessments. These ignore the wider planning benefits of freeing up the centre of Guildford to the OVERALL planning community benefit, in terms of GVA gained and wider community benefits. The Local Plan should have provided full EVIDENCE of the Financial and Social Costs AND Benefits of any road proposals. Where are they?

Pressure of housing in Guildford hinterland & impact on Guildford

Within and around Guildford there are a large number of housing proposals, such as Slyfield, Blackwell Farm, Wisley Airfield, Dunsfold Park Airfield, Burnt Common, Wellesley Aldershot, Godden Hill Farm and many more. The traffic implications, even if only a few new residents use Guildford, are not fully assessed in the Local Plan.

Impact of, and access to a major North Street development

If the is to be a successful re-development (there have be FOUR attempts in 30 years! I know, I've lived in Guildford since 1986) there must be a full appraisal of this proposal on the Local Plan. It seems to be largely silent on this subject

Impact of, and access to, a major New - much larger - Rail Station, Including new rail platforms, the re-built road/rail bridge to take larger trains.

Its well known the number of rail passengers using the station has increased and will increase still further in the next 10/20 years. The Local Plan must PLAN for this, but it is largely silent on this subject. The station is planned to be much larger, with extra platforms, and larger trains. The 19th century road - rail bridge, (the ONLY link between East and West Guildford) is long over due to be replaced, especially as new rolling stock comes into use. Why does the Local Plan ignore all this information?

Attached documents:

Comment ID: SQLP16/1379  Respondent: 8865537 / P Waldner  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.
The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/741  Respondent: 8880353 / Judith Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as being 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.

Attached documents:

Comment ID: SQLP16/1390  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.
The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Comment ID:** SLP16/644  **Respondent:** 8881665 / Mike Forster  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

**Attached documents:**

**Comment ID:** SLP16/645  **Respondent:** 8881665 / Mike Forster  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

- Transport evidence is not yet fit for use and major transport issues are unresolved eg another river crossing, a central bus facility which in our opinion would best be sited underground so as to leave open community space at street level.

Please register our comments against the current proposed Draft Local Plan as soon as possible.

**Attached documents:**

**Comment ID:** SLP16/1992  **Respondent:** 8889761 / A Dougherty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

The use of the SHA which was available on the day of the 6 week consultation period effectively prevently reasonable discussion and digestion of such a large report, however within itself stating conflicting and unsatisfactory evidence and facts. Specifically noting a 1000 homes would not generate any extra traffic. As well as operating a floored and out of date programme basis and yet still conclude there would be congestion.

I request the draft plan is to be reconsidered in a correct and appropriate manner with correct procedure and consultation. Enabling local communities to identify correct sustainable development within our borough and develop existing urban areas, rather than impacting on green belt land.

**Attached documents:**

**Comment ID:** SLP16/1261  **Respondent:** 8892737 / David Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

The use of the SHA which was available on the day of the 6 week consultation period effectively prevently reasonable discussion and digestion of such a large report, however within itself stating conflicting and unsatisfactory evidence and facts. Specifically noting a 1000 homes would not generate any extra traffic. As well as operating a floored and out of date programme basis and yet still conclude there would be congestion.

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**Attached documents:**
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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/1602  Respondent: 8893057 / Dianne Garnett  Agent: 8893057 / Dianne Garnett

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

1.1 We object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent

1.2 Key parts of the evidence base are flawed or based on withheld assumptions.

1.3 The current SHMA inflates the proposed housing figure due to the following factors:

the failure to correct for errors in the historical data for international migration flows;

the way it considers students and affordability, and

the flaws in the method for estimating the number of homes needed to support job growth

the treatment of vacant property

1.4 The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

1.5 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

1.6 The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.
1.7 It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

1.8 The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

1.9 Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

1.10 No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

1.11 Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.

1.12 The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

1.13 The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patters in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

1.14 We believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

Attached documents:

Comment ID: SQLP16/1870  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

1.1 We request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

1.2 We request that once our objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

1.3 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. We are concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.
1.4 The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

1.5 The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes over the plan period, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.6 We are concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.7 In our opinion much of the proposed local plan appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

Attached documents:

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<th>Comment ID:</th>
<th>SQLP16/1874</th>
<th>Respondent:</th>
<th>8893057 / Dianne Garnett</th>
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1.1 To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way I have come across well informed opinion from individuals and organisations and I make no apology for including what I believe are correct and clearly expressed statements regarding the wide ranging issues to hand. I would therefore like to give thanks to others for their valuable contributions. However, I have of course referenced all statements made by retained consultants by GRA and CPRE e.g. NMSS and Green Balance.

1.2 NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald

1.3 Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate

1.4 On matters of road infrastructure, I have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins

1.5 On matters of property research, development, planning and valuation I have relied on my own skills and experience as a former Chartered Surveyor and Management Consultant specialising in property strategy and research in the public and private sectors. I have also used some material from my review of the Town Centre Masterplan 2015 which I reviewed for the Guildford Greenbelt Group and which can be found on their website.

1.6 References to “local plan” are intended not to be the previous 2003 Local Plan but to be references to the current Regulation 19 draft local plan prepared by Guildford Borough Council.

1.7 GBC refers to Guildford Borough Council

1.8 SHMA refers to the Strategic Housing Market Assessment 2015 prepared by GL Hearn

1.9 OAN refers to the Objectively Assessed Need in relation to housing

1.10 NPPF refers to the National Planning Policy Framework

1.11 CPRE refers to the Campaign for the Preservation of Rural England
1.12 GRA refers to the Guildford Residents Association which comprises over 25 Residents Associations and five Parish Councils

1.13 SSAG refers to the Save Send Action Group which comprises over 500 residents

1.14 ELNA refers to the Employment Land Needs Assessment 2015

1.15 NPPF refers to the National Planning Policy Framework

1.16 NPPG refers to the National Planning Policy Guidance

1.17 VoA refers to the Valuation Office Agency

**Attached documents:**

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**Comment ID:** SQLP16/1432  **Respondent:** 8896097 / Andrew Fordham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

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**Comment ID:** SQLP16/795  **Respondent:** 8897377 / Jan Jewers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

19. I object to GBC not listening to the local people in 2015 and continuing to impose the same style of Local Plan in 2016

**Attached documents:**
20. I object to GBC’s lack of providing a readable, concise summary and for the continuation of releasing new data after the Plan was published in June 2016

Attached documents:

I believe that much of the evidence provided is seriously flawed

Attached documents:

Reg 19 Consultation objection and right to comment on broader issues

My first objection is to due process. GBC has claimed a reg 19 consultation. As a result it has requested comments only on changes and referenced to the particular clause. This is a breach of due process because substantial/material changes have been made to the Draft Local Plan including a major change to the OAHN as stated by Councillor Spooner, removal of one of four only strategic sites which impacts all strategic sites, changes (increased withdrawal in many cases) to the greenbelt boundaries and in particular A35 with and without consent from owners, incomplete data sets and a requirement from Highways England as a compromise for their withdrawal of major concerns at the impact of the Plan on Highways on the A3 that infrastructure has to be in place before major developments ‘come forward in advance of critical infrastructure’:

All of these changes cannot be considered minor and therefore the request to comment only on the change clause itself is not in accordance with the law. The effect of these attempted changes are that the DLP of 2016 must therefore be considered ‘unsound’ to have caused the major changes and therefore it is not a valid reg 19 consultation.

In that case comments should be allowed to any material aspect of the Plan and not just to particular clauses.

Generally, it is disappointing to note that the Council has given very little weight to either the councils own refusal of the planning application on site A35 or indeed to any of the thousands of representations made by ourselves and other members of the public and statutory bodies.

I am of the view that the current consultation cannot legally constitute a regulation 19 consultation

1. I object 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.
2. I object 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. I object to the Council wasting taxpayers’ and residents’ time and money not following due process and indeed ignoring previous representations.

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/1173</th>
<th>Respondent: 8899713 / Tessa Crago</th>
<th>Agent:</th>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

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<th>Respondent: 8901633 / Duncan Gray</th>
<th>Agent:</th>
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<td>Answer: ()</td>
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1. **Questions posed by Guildford Borough Council as part of its consultation.** Questions from GBC

20.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence.

The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our [website](#) (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?
ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:
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Questions from GBC

**24.A. Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our [website](#) (links open in a new window).

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**ANSWER**

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**Attached documents:**

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**Comment ID:** SQLP16/1696  **Respondent:** 8905537 / Christopher Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/709  Respondent: 8906177 / Peter & Robyn Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

- I consider the calculation of housing need is unsubstantiated. The model has not been scrutinised and fundamental assumptions are flawed. Housing target is unconstrained.

Attached documents:

Comment ID: SQLP16/1692  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

I OBJECT TO GENERAL INCOMPETENCE OF PLAN with a lack of specifics mentioned and real analysis of direct impact. I don’t believe there has been a rigorous and definitive published analysis. Specifics are none existent in terms of what infrastructural changes will be required

Attached documents:

Question 1: No - The evidence base and submission documents are out of date, inconsistent, updated and designed to purposefully give an outcome and the core evidence, on which GBC has based all its decisions, the Strategic Housing Market Analysis is not transparent, has clearly not been scrutinised or evaluated. Residents’ genuine concerns regarding the housing forecasts have been ignored. Evidence has been rewritten and updated but it is impossible to keep up with changes because you don’t know where they are. Not all the evidence was ready before The Plan was passed at full council so there was no time for councillors to scrutinise the missing documents. The majority push The Plan to the next stage of the process. This was a disgraceful decision. Residents in my village had to use the Freedom of Information to
request documentation. Every policy in the Plan is pro development and if cast in stone, not one of the policies would succeed in preventing inappropriate development within the Borough.

Attached documents:

**Comment ID:** SQLP16/784  **Respondent:** 8916001 / Ockham Parish Council (Peter Bevan)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

**Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)**

Ockham Parish Council (OPC) has reviewed the Proposed Submission Local Plan (Local Plan) and considers that:

1. Despite GBC’s claims 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. This is unacceptable, and raises questions of governance and vested interests.
2. The Local Plan places growth above: the ongoing viability, character and “liveability” of Guildford town centre and neighbouring villages; protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA; the adequacy of existing and planned infrastructure; and remedying the chronic traffic congestion in and around Guildford, along the A3, and local rural roads.
3. The Local Plan offers 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 OPC’s view threaten the soundness of the Plan as a whole on grounds of non or inadequate 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.

Attached documents:

**Comment ID:** SQLP16/823  **Respondent:** 8916353 / John Franklin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

**Comments and Objections to New Draft Guildford Local Plan 2016**

I wish to object to the new Draft Guildford Local Plan 2016;

1 GBC do not seem to have listened to all the people who commented on the 2014 Draft Guildford Local Plan. The 2016 version is still focused like the 2014 plan was, there is no change in strategy.

Attached documents:
I OBJECT to the latest version of the local plan. It looks like the previous one only slightly changed and the main objections to that still apply to this version.

Attached documents:

Priorities

Identify the housing need for the whole area then proportion according to the area characteristics and population

Expand Guildford town giving minimal effect on surrounding villages

Do not use current green belt it is sacrosanct

Use brown land first for housing and shops

Develop around river mixture of leisure and housing

Use multi storey car parks in place of open land car parks

Traffic pinch point of A3 at Guildford to be resolved (tunnel preferred)

Any limited development to retain the existing housing density

Comments on Document

General

- Loss of Green Belt irreversible once lost
- Green belt extremely important to residents
- Proposed density does not reflect existing character (Lovelace Village)
- Housing needs should be spread out so as not to change character of areas

- Few local employment opportunities

- Massive increase in population is not conducive to the village existence

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1560  Respondent: 8919009 / Andrew Kukielska  Agent:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</th>
</tr>
</thead>
</table>
| Answer: (No)              | I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant. The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

<table>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answer: ()</td>
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</tbody>
</table>
| I note that the quality of evidence remains poor and is in some cases out of date and in most cases inconsistent. For example: I object to the fact that there is no comprehensive list of the evidence base. See below:

It is incumbent on the Council to ensure that the evidence base is readily accessible and completely transparent. I am of the opinion that the evidence is neither easily accessible nor transparent. I object to the use of the 1st 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. I also object 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. I continue 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. I object to the ELNA and in particular the Carter Jonas study update 2017 which includes “demand” for retail space from companies in administration.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/729</th>
<th>Respondent: 8925217 / Andrew Lock</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: ()</td>
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</tbody>
</table>

THE EVIDENCE BASE USED TO ASSESS HOUSING NEEDS HAS BEEN PROVEN TO BE FLAWED AND HAS NOT BEEN CORRECTED SINCE THE LAST DRAFT A FEW MONTHS AGO.

CONCLUSION.

THE NEW DRAFT LOCAL PLAN NEEDS TO BE REJECTED AND RE ISSUED USING THE CORRECT EVIDENCE BASE

THERE IS NOT ENOUGH BROWNFIELD SITES BEING RE DEVELOPED.

TO BUILD ON, OR NEAR FLOOD PLAINS IS HIGHLY DANGEROUS TO THE DEVELOPMENT AND NEARBY HOUSES.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/357</th>
<th>Respondent: 8928097 / Sue Wyeth-Price</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
<td>Answer: ()</td>
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</tbody>
</table>

My general concerns regarding the overall plan are as follows:

I am concerned that such a large, increased, proportion of the anticipated housing requirement is planned to be built in the areas of the borough with the lower LSOA ratings, and that the mix of these houses is such that larger, less affordable houses are to be permitted within those areas, pricing them out of the reach of the local population. This does not satisfy the local housing demand and will instead encourage migration from outside the local areas. This is turn will create a greater demand on the already strained infrastructure.

I object that comments from the local residents and those made through Ash Green Resident’s Association to previous versions of the plan have failed to be included in the current plan. These comments have not only been ignored but the changes to this version of the plan have resulted in an even worse situation for Ash Green.

This version of the plan, with its proposed boundary around Ash Green, is Orwellian in that all the houses are now included in the rural area whilst the open fields and countryside have been included in the Ash and Tongham Urban Area, simply to make more land available for building and ignoring the impact that this will have on the true rural area of Ash Green.
The evidence based used does not support the new boundaries of Ash Green and specifically ignores the historical location of Ash Green, centred on Ash Manor. The Heritage section of the Draft Plan discusses our “rich and varied architectural heritage” but then ignores this when setting Ash Manor outside the boundaries of Ash Green.

The area around Ash Green has very little in terms of a supporting or sustainable infrastructure. The local roads, specifically around Ash Station, Ash Street and the Greyhound Roundabout junction with Manor Road are becoming impassable and the current plan does not include any changes to the infrastructure to support the additional housing around the congested roads.

Attached documents:

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**Comment ID:** SQLP16/99  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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**Concluding remarks**

EHPC does not share the same vision for the future of Guildford Borough as GBC, although we 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 EHPC OBJECTS to the Proposed Submission Local Plan.**

We 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.

We reserve the right to make further submissions during the course of this consultation.

Attached documents:

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**Comment ID:** SQLP16/802  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()
1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/485</th>
<th>Respondent: 8932097 / Robert Charlwood</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td>Answer: ()</td>
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<tr>
<td>No comment</td>
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<tr>
<td>Attached documents:</td>
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</tbody>
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<tr>
<th>Comment ID: pslp17q/109</th>
<th>Respondent: 8933537 / Annie Ladd</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
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<td>Answer: ()</td>
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1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:
12.8 Importantly, the development will support the delivery of a significant infrastructure package which will benefit both its future residents and nearby parts of Guildford and the Borough as a whole. MGH is committed to the delivery of all necessary infrastructure to support the development of Gosden Hill and will continue to work with relevant consultees to agree a more detailed strategy.

12.9 MGH will continue to engage with GBC, SCC and other delivery bodies to review the Infrastructure Schedule provided at Appendix C of the Local Plan and seek to agree costs and funding sources. For the reasons set out above, it is vital that the issue of viability and the significant infrastructure and financial burdens which are indicated for Gosden Hill are carefully considered by GBC as it progresses its CIL Charging Schedule (with consultation due later in 2016).

12.10 MGH welcomes the progress made by GBC in preparing the Local Plan and the intention of the plan being adopted by the end of 2017. MGH intends to participate in the Examination of the Local Plan to present the representations set out above.

<full document attached>

Attached documents: 21633 P7c A5 MK GBC Proposed Submission Local Plan reps - reduced size.pdf (12.7 MB)

Comment ID: pslp17q/451  Respondent: 8948385 / Gillian Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)

Question 1: The evidence base and submission documents

Answer: No

Comment: The data underlying the Proposed Submission Local Plan is flawed:

- The SHMA grossly overestimates the housing number.
- Details underlying the SHMA have not been made public.
- The SHMA has not been scrutinised by the Scrutiny Committee.
- Other independent analysis has resulted in a much lower housing number.
- The SHAR grossly understates the current traffic levels and thus underestimates the effect of proposed developments on local traffic infrastructure.

Attached documents:

Comment ID: SQLP16/1326  Respondent: 8961889 / F Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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**Comment ID:** SQLP16/1774  **Respondent:** 8968001 / M & G Real Estate  **Agent:** Terence O’Rourke (Tim Hancock)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

---

**Comment ID:** SQLP16/748  **Respondent:** 8970785 / Guildford Residents Association (Graham Hibbert)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

I have little confidence that the OAN has been prepared to the highest professional standards and I believe that the figure it produces of 693 dwellings pa is too high. The independent but professionally prepared GRA report confirms my view and indicates that a lower figure of some 500 dpa is adequate to meet even robust growth assumptions. It also points to errors in the SHMA that the Council should have found themselves. The forecast population shifts in Guildford are so different from the other Surrey boroughs that, as the GRA report recommends, it makes eminent sense to consider student movement separately from the movement of other groups in society.

I am amazed that the document does not seek to apply significant constraints to limit overall housing growth, as is clearly demanded by the topography of our town; a gap town surrounded by greenbelt. Our current traffic situation is poor and is limiting the growth that our high tech sector can provide. Yet the transport improvement plans in the Submission Plan do not seem adequate to deal with the current problems and the level of housing growth that is proposed. The proposed level of housing growth is over double the target that has been in place since the year 2000 and our infrastructure development has not kept pace with even that. I am therefore concerned with the adequacy of the safeguards in the Submission Plan to ensure that future infrastructure improvements plans will be in place before future housing development occurs, although I accept that this is what the Council intends.
Tourism is a major industry in our borough and so maintaining the character of the borough is important. The plan intends to move the Green Belt boundaries again, seemingly without adequate consideration as to what it will do the character of our borough. The Green Belt and Countryside Study does not, to my mind, value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing instead in major settlements beyond the Green Belt.

In view of recent technological trends, I believe that the Plan puts too much focus on retail development in the town centre and too little on providing further residential accommodation which would create a more vibrant centre to our town.

Lastly I am not convinced that the Plan adequately addresses current pollution problems in our town, such as air quality and the noise from the A3 that reduces the quality of life of residents from Burpham to Onslow.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2003</th>
<th>Respondent: 8977025 / Sustainable Land PLC</th>
<th>Agent: Roger Daniels</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td>Answer: (No)</td>
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</table>

No.

The accompanying report points to shortcomings in the Green Belt & Countryside Study as a basis for reviewing Green Belt boundaries and identifying appropriate allocations to meet the objectively assessed need for housing throughout the plan period.

The Land Availability Assessment is not based on a consistent rate of housing delivery that reflects housing requirements and shows a shortfall in housing land supply in the early years of the plan, including the absence of a five-year supply of housing land.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/194</th>
<th>Respondent: 9040673 / Anne Pearse</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer: ()</td>
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</table>

I object, this plan is ill conceived in relation to A44

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/353</th>
<th>Respondent: 9062913 / Susan Parker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
<td></td>
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<tr>
<td>Answer: (No)</td>
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</tbody>
</table>
I object to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions.

The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

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

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

The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

“There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1991</th>
<th>Respondent: 9079393 / Wisley Property Investments Ltd.</th>
<th>Agent: Savills (Charles Collins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</tbody>
</table>
Commentary on the Evidence Base

The evidence base supporting the GBLP is understood to comprise:

- Affordable Housing Viability Study (April, 2008)
- Conservation Character Area Appraisals
- Employment Land Needs Assessment (September, 2015)
- Guildford Local Plan Viability and Affordable Housing Study (2014)
- Habitat Regulations Assessment (June, 2016)
- Infrastructure Baseline (July, 2013)
- Infrastructure Delivery Plan (2016)
- Land Availability Assessment (2016)
- Options Growth Scenarios Transport Assessment Report (January, 2014)
- PPG17 Open Space Sport and Recreation Audit (February, 2006)
- Retail and Leisure Study (May, 2014)
- Settlement Hierarchy and Settlement Profiles (May, 2014)
- Strategic Flood Risk Assessment (2016)
- Strategic Highway Assessment Report (June 2016)
- Strategic Housing Land Availability Assessment (SHLAA) (May 2014 Update)
- Surface Water Management Plan (November, 2013)
- Sustainability Appraisal Report (May, 2016)
- Topic paper - Flood Risk
- Topic paper - Environmental Sustainability and Climate Change
- Topic paper - Green and Blue Infrastructure
- Topic Paper - Retail and Town Centre
- Topic paper - Tourism and Leisure
- Topic paper - Duty to Cooperate
- Topic paper - Employment
- Topic paper - Green Belt and Countryside
- Topic paper - Housing Type Tenure and Mix
- Topic paper - Housing Delivery
- Topic Paper - Transport
- Town Centre Vitality and Viability Report (2011)
- Guildford Borough Transport Strategy 2016 (April, 2016)
- Guildford Draft Local Plan: Education Review (May, 2016)
- West Surrey Strategic Housing Market Assessment (September 2015)

The evidence which has been updated/published since the submission of WPI’s representation in September 2014 is indicated in bold and has been referred to in this Representation where appropriate.

Sustainability Appraisal (SA)

WPI strongly supports SA Option 4. This Option includes a mix of sites/allocations based on achieving Objectively Assessed Needs (OAN) plus a reasonable (and justified) buffer of 14%. A buffer over the OAN of 693 dwellings per annum (dpa) (13,860 over the plan period) is entirely justified, as outlined in WPI’s representations on draft policy S2 (Borough Wide Strategy). The SA therefore forms a robust basis to justify the Local Plan; it could and should however be enhanced to provide further justification.

It is not clear why the SA includes analysis of housing completions and commitments, as a planning decision has been made on these sites, and in the case of completions, the relevant development delivered, and hence part of the overall
baseline. The SA has to be based on the plan period, and plan, hence the period 2013-2033. However, it also has to be grounded in the reality that the plan will be adopted in 2017, and hence the SA is principally an assessment of the proposed allocations, which will make up the vast majority, circa 90%, of the OAN (excluding any buffer).

Option 3 (OAN plus 12% buffer) includes Liddington Hall (600 dwellings). This site is not proposed for allocation within the GBLP. Whilst it is appreciated that the option to test Liddington Hall should be included (as part of the assessment of reasonable alternatives), it is the case that the Wisley new settlement can form a credible option for assessments below Option 4, i.e. within OAN plus 12% buffer or less. The Wisley new settlement could form a new Option to be tested alongside:

- GBGB – Ash & Tongham extensions 1,235 dwellings. It is not clear why 1,835 is included in Option 3, as this level of growth is otherwise only triggered with OAN plus 27% buffer (Option 6)
- Send Marsh allocations at 0 (as these are not proposed in the GBLP)
- Liddington Hall at 0 (as this site is not proposed in the GBLP)
- Normandy/ Flexford at 0 (as although this site is a proposed allocation, there is presently no option included which does not assume its none allocation – WPI questions the application of the ‘sequential approach’ in this regard – see paragraph 2.8 onward of this Representation)

With all other variables fixed (as per Option 4) this would equate to a further Option ‘2A’ of 14,744 dwellings (OAN plus 6% buffer).

WPI notes that the analysis of the SA on page 26 is not consistent with the Housing Topic Paper with respect to the Wisley new settlement. In addition, the SA could be enhanced through further option testing with respect to the proposed ‘sequential approach’

The first comment is in respect of the sequential approach. WPI agrees that Brownfield sites and sites within existing urban areas are sequentially preferable locations for growth (noting the capacity constraints in these locations). It is not necessarily the case that all Green Belt around Guildford town should be considered as sequentially preferable to a new settlement option, notably as the new settlement option at Wisley Airfield is partly previously developed land. It is also not clear why Normandy and Flexford has not been included as an option, rather a ‘given’ in all 8 Options. The site is Green Belt, all Greenfield, and would deliver a reduced quantum of development, and hence ‘critical mass’ to the Wisley new settlement. Whilst WPI has no in-principle objection to the Normandy and Flexford allocation, the prospect of it as an option would aid the robustness of the SA.

WPI maintains a technical objection with respect to the wording of the SA regarding the Wisley new settlement (see page 26 of the GBLP). The following is the case, and would better reflect the GBLP inclusion of a new settlement allocation (as per the Housing Topic Paper):

- The only available and realistic location for a new settlement in Guildford Borough is at Wisley Airfield.
- The site contains the largest previously developed site in the Guildford Borough Green Belt (circa 77 acres).
- The site was progressed through a planning application (reference 15/P/00012) directly in support of the emerging Local Plan, to assist with the overall evidence base and demonstrate early delivery. This remains the case and, on the basis of the reasons for refusal, there are now a number of resolvable Key Considerations to enable the delivery of the proposal through planning (see Appendix 1).
- A Local Plan allocation may of course be justified based on the tests of the NPPF, which are not the same as the specific (and detailed) requirements for a planning application.
- There are no matters which call into question the suitability of the site for a new settlement.

WPI understands why the Wisley new settlement is identified as an option, however, it must be tested equally and fairly against other site options, based on the facts, and relative sustainability. In other words, the SA should test further combinations of options. Page 26 must be updated to reflect the available evidence presented in these representations.

WPI has outlined in Appendix 8 analysis of the draft allocations against the wider evidence base, notably the Green Belt & Countryside Study (2014). This objectively outlines the value of each major draft allocation against the defined purposes of the Green Belt (as given by the NPPF). WPI has undertaken this exercise to question the SA’s conclusions of
Low, Medium and High sensitivity, against each draft allocation/development option, in terms of Green Belt sensitivity (see maps Options 1-8). This evidence indicates that the Wisley new settlement should be reclassified as low sensitivity.

Attached documents: 160715 Local Plan Reps - July 2016 and Appendices.pdf (11.5 MB)

Comment ID: pslp17q/419  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Jim Beavan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()

2. Commentary on the Updated Evidence Base

2.1. The evidence base supporting the 2017 Submission GBLP has been updated since the 2016 publication. The current evidence base now comprises the following:

- Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites “June 2017” (June 2017)
- Assessment of Sites for Amenity Value (2017)
- Assessment of Viability of Carbon Emission Targets for New Builds (April 2017)
- Borough, Economy and Infrastructure EAB Report Sustainable Movement Corridor Update (February 2017)
- Employment Land Needs Assessment (2017)
- Guildford Local Plan and CIL Viability Study (2014)
- Guildford Town and Approaches Movement Study: Equality Impact Assessment (March 2015)
- Habitat Regulations Assessment (June, 2017)
- Land Availability Assessment (2016)
- Land Availability Assessment Addendum (2017)
- Open Space, Sport and Recreation Assessment (2017)
- Retail and Leisure Study Addendum (February 2017)
- Strategic Highway Assessment Report (June 2016)
- Strategic Highway Assessment Report Addendum (2017)
- Strategic Housing Land Availability Assessment (SHLAA) (May 2014 Update)
- Sustainability Appraisal (June 2017) and non-technical summary (2017)
- Topic paper 2017 - Flood Risk
- Topic paper 2017 - Environmental Sustainability and Climate Change
- Topic paper 2017 - Green and Blue Infrastructure
- Topic Paper 2017 - Retail and Town Centre
2.2. The evidence is referred to in this Representation where appropriate.

Sustainability Appraisal (SA)

2.3. WPI previously objected to the draft Sustainability Appraisal (SA) (2016 version). This objection is withdrawn, on the basis of the 2017 SA which is now supported.

2.4. In the 2017 SA, the expected housing to be delivered through each site is either referred to as “givens” (i.e. it will come forward) or “variables” (may come forward). Those which are “givens” include housing completions and commitments since the start of the plan period, an assumption for windfall sites and an assumption for rural exception sites (see footnote 38 page 34).

2.5. Wisley Sustainable New Settlement, as identified as project “tier 9” (page 32), with the associated provision of 2,000 dwellings is stated to be “a given”. The change from being regarded as “a variable” from the 2016 SA is strongly supported by WPI and GBC’s comment that there is now a “greater degree of confidence in the potential for a new settlement at the site to be suitable, with the right planning application” is a welcome addition to the SA.

2.6. There is a slight error in the SA in that Wisley Sustainable New Settlement is categorised in two places with two different “tier” numbers. See in particular table 6.3 (page 39) which refers to the site as “tier 8” compared with the detailed text at paragraph 6.6.12 whereby the provision of a new settlement is referred to as “tier 9”. This should be clarified to avoid confusion.

2.7. There are now 8 reasonable alternatives considered in the updated SA, and this has built upon the 2016 SA. WPI supports the inclusion of Wisley Sustainable New Settlement in all of these reasonable alternatives for the delivery of 2,000 dwellings, and the fact that all 8 Options propose to exceed the OAN over the plan period. These 8 options are summarised in Table 2.1.

Table 2.1: Summary of the 8 Reasonable Spatial Strategy Options Assessed in the SA 2017

<table>
<thead>
<tr>
<th>Option</th>
<th>Total Housing provision</th>
<th>Variation on OAN</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>13,600</td>
<td>9.4%</td>
</tr>
<tr>
<td>2</td>
<td>14,080</td>
<td>13.3%</td>
</tr>
<tr>
<td>3</td>
<td>14,200</td>
<td>14.3%</td>
</tr>
<tr>
<td>4</td>
<td>14,600</td>
<td>17.5%</td>
</tr>
<tr>
<td>5</td>
<td>14,680</td>
<td>18.1%</td>
</tr>
<tr>
<td>6</td>
<td>15,080</td>
<td>21.4%</td>
</tr>
<tr>
<td>7</td>
<td>15,200</td>
<td>22.3%</td>
</tr>
<tr>
<td>8</td>
<td>15,680</td>
<td>26.2%</td>
</tr>
</tbody>
</table>

2.8. The “given” sites, including Wisley Sustainable New Settlement, contribute to circa 8,317 dwellings of the total provision. The contribution of Wisley Airfield to the given housing contribution of 8,317, is 24%. Evidently, the site is a
fundamental aspect of all growth options for the GBLP and Local Authority area as a whole. This positively reflects the ongoing discussions and proactive work that has been undertaken with GBC over the last 12 to 18 months.

2.9. The remaining contributions for the above 8 options are to come forward through a combination of “variable” sites, notably comprising development sites in the countryside beyond the Green Belt, Green Belt urban extensions to Guildford, or Green Belt urban extensions to villages.

2.10. It is positive to see that GBC are considering all options for growth, taking forward those from the 2016 SA and recommendations to explore alternative strategic options.

2.11. The SA indicates that GBC’s preferred option is Option 1, delivering 9.4% above the OAN. Whilst WPI does support the intention to exceed OAN, particularly in light of their representations made to the Submission GBLP in July 2016, whereby it was suggested a 6% buffer would be appropriate, Option 1 provides the smallest additional buffer above OAN, and GBC fully acknowledges that this is likely to result in unmet need within the wider Housing Market Area (HMA). Subsequently, in order to help address the housing needs of the wider HMA, and as part of the Duty to Cooperate, WPI believe that GBC should consider implementing an alternative Option as part of the GBLP.

2.12. With specific regard to Wisley Sustainable New Settlement, the maps contained within the SA all continue to refer to Wisley Airfield as having a “medium” sensitivity. Although this is based on the Green Belt and Countryside Study 2013, there is no change to correctly reflect the findings that the site is “low to medium sensitivity”. WPI’s representations made to the Submission GBLP in July 2016 clearly emphasised the importance of this being accurately reflected in the SA. WPI continue to recommend this change.

2.13. Chapter 10 of the updated SA includes site specific comments on Wisley Airfield. Where concerns are raised, these have been addressed through technical work undertaken on behalf of WPI, both in respect of the allocation of the site in the Emerging GBLP and in relation to the ongoing appeal at the site. For example, a drawback of Option 1, as noted in the SA, is that Wisley Airfield is regarded as being “particularly sensitive” from a biodiversity perspective. However, technical work has been undertaken, in addition to consultation with Natural England, both of which are then noted in the SA (para 8.2.2) and suitable mitigation measures can be provided. Refer in particular to the Appendix 4 of WPI’s July 2016 representations to the Submission GBLP which contains an Ecology Technical Note and Natural England Consultation Reply. Further details are also provided in Appendix 3, whereby an addendum report, produced by Ecological Planning and Research Ltd (EPR), is contained, which outlines the reasons why the proposed SNCI designation for the entire site is not justified.

2.14. The updated SA includes the assessment for Wisley Airfield. This is reproduced in Table 2.2 below.

**Table 2.2 SA of Wisley Airfield strategic development site**

[see attachment for table]

2.15. It is noted that there is now one less category in the SA, namely, the size of the site. However, other than this change, there is no change between the conclusions of the 2016 and 2017 SA for Wisley Airfield. This is supported.

2.16. In respect of Table 2.2, it is noted that a number of the criterion where Wisley Airfield has scored ‘red’ (negative impact) are addressed by the emerging policy A35.

- **SNCI** – This designation is unjustified as outlined by the available evidence and this representation.
- **Key Employment Site** – large scale employment is not proposed as part of the allocation, however some employment is and thus the SA may better reflect this as a neutral factor
- **Healthcare** – the delivery of a new settlement will have an impact on healthcare, hence the requirement in emerging policy for this designation.
- **District/ local centre** – by definition a new settlement will not benefit from existing centres, The creation of a new village centre (as a local centre) is an integral part of emerging policy
- **Healthcare** – the delivery of a Sustainable New Settlement will have an impact on education, hence the requirement in emerging policy for a new primary/ secondary school, and for nursery provision,
Agricultural land – as demonstrated in evidence, the delivery of Wisley new settlement on WPI land will result in a net loss of Best & Most Versatile Agricultural land of less than 20 hectares

Railway Station – the emerging GBLP, including the Infrastructure Delivery Plan, and emerging policy A35 requires a bus based sustainable transport strategy, which will ensure direct linkages to Horsley and Effingham Junction railway stations. By definition only, is the new settlement not located on a railway line.

2.17. In addition, WPI makes the further Site specific comments on the SA, including those on communities (Para 10.4.4) which refer positively to the contribution to community infrastructure, but negatively regarding the distance from a town centre and potential impacts (excluding possible A3/M25 upgrades). This is further noted in paragraph 10.16.5 where it states that the site does not perform well based on its location, but its scale provides good potential for high quality bus services and cycle routes. Upgrades to the highway network are noted.

2.18. Paragraph 10.8.3 refers to the historic environment but notes that there is good potential to mitigate impacts through site specific policies which have been strengthened following the 2016 SA.

2.19. On housing, see paragraph 10.9.8 which indicates a need for some specialist housing and self-build plots on strategic sites including Wisley.

2.20. A recommendation is included at paragraph 10.19.3 for the site specific policy for Wisley Airfield to ensure that impacts on the SNCI are minimise.

Changes sought

2.21. None of the comments made by WPI go to the heart of the SA, and are made purely as clarifications.

Land Availability Assessment (LAA)

2.22. The addendum to the LAA (2017) includes a new housing trajectory for the plan period. Table 2.3 shows the stated delivery rate for Wisley Sustainable New Settlement. The proposed trajectory identifies strong reliance on the delivery of dwellings from Wisley Airfield in the first ten years of the GBLP.

Table 2.3 Extract from the LAA housing trajectory

[see attachment for table]

2.23. WPI makes no detailed comment on emerging housing or spatial strategy policy S2. The emerging context is of relevance, and highlights the importance of the early delivery of the GBLP.

2.24. The Examination process into the Waverley Local Plan is presently ongoing. The District is relevant as it forms part of the West Surrey Housing Market Area as Guildford (along with Woking).

2.25. The Inspector for the Waverley EiP acknowledged the significant requirement for affordable housing within the HMA, recommending 25% uplift on OAN to reflect affordability pressures.

2.26. In addition, The Inspector has recommended that Waverley should be taking 50% of the unmet need from Woking and has asked for the Council’s housing figure to be increased to 590 dpa. I understand the break down to be as such:

• 396 dpa starting point
• 495 dpa to give a 25% uplift
• + 12 dpa to account for affordable housing need, household formation and London migration
• +83 dpa to meet 50% of Woking Borough’s unmet need

2.27. WPI makes no comment on the issue of unmet need. WPI simply wishes to note that the need to deliver homes promptly in GBC, notably in locations close to Woking (such as Wisley) are therefore of increased relevance. Thus, the wider Housing Market Area should rightly have influence over the proposed GBLP housing trajectory.

Changes sought

• None. It should however be noted that the trajectory which is being promoted by WPI envisages the delivery of dwellings from 2020/21, and a faster build out to 2031/32.

Infrastructure Delivery Plan (IDP)

2.28. WPI notes the IDP as the same as the 2016 version. No further comments.

Topic Paper – Housing Delivery

2.29. The 2017 Housing Topic Paper continues to provide strong and reasoned justification for the allocation of Wisley Airfield, and hence is supported. The Topic Paper is helpful explanation of the emerging GBLP.


2.30. WPI’s comments on this Topic Paper are largely provided in relation to policy ID2. In particular, it is noted that there is limited (if any) location specific evidence to support the proposed targets and strategy for sustainable construction and development, over and above the National Standards Review.

Topic Paper – Blue and Green Infrastructure.

2.31. WPI’s comments on this Topic Paper are provided in this representation with particular regard to the Strategic allocation policy A35 for Wisley Airfield. A supplementary commentary is also provided by WPI’s appointed ecologist Ecological Planning and Research Ltd (EPR) at Appendix 1, which should be read in addition to this representation and the report provided in Appendix 4 of WPI’s representations to the Submission GBLP (July 2016).

3. WPI Updated Position with respect of Representations on the GBLP

3.1. Representations were submitted to GBC in July 2016 in respect of the Submission version of the Emerging Local Plan. A summary table is included (see Appendix 1) setting out these representations and the original changes sought to the emerging GBLP. This is for reference only.

3.2. This Section reviews the changes now proposed through the Focused Amendments Local Plan, in light of the summary table from WPI’s July 2016 representations and additional comments are made by WPI in respect of those proposed changes. WPI’s additional comments and representations on the Focused Amendments are therefore provided in this section.

Table 3.1 Table examining Focused Amendments in light of the changes sought by WPI in the submission Local Plan (July 2016).

[see attachment for table of representations]
It is not clear why completions and existing commitments form part of the assessment. Test a new Option ‘2A’ including the Wisley new settlement, which would represent OAN plus 6% buffer (14,744 dwellings). Amend the SA text with respect to the Wisley new settlement on page 26, to ensure in particular that it is consistent with the Housing Delivery Topic Paper (June 2016) in respect of the positive benefits of the Wisley new settlement. This should make clear that there are no matters which call into question the suitability of the site for a new settlement.

Revise the classifications of Low, Medium and High sensitivity Green Belt, noting that the Wisley new settlement is ‘low to medium sensitivity’.

A New Sustainability Appraisal has been published dated June 2017. Note that reference is made to housing numbers as “givens” and this includes housing completions and commitments since the start of the plan period, an assumption for windfall sites and an assumption for rural exception sites (see footnote 38 page 34). There is no detailed analysis of completions or commitments.

Chapter 6 refers to the locations for development as either “a given” or “a variable”. Wisley New Settlement (tier 9 – page 32) and provision of 2,000 dwellings is “a given”. Para 6.6.12 states that this is an evolution since the 2016 SA where the site was regarded as “a variable”, reflecting the refusal of planning permission. There is now a “greater degree of confidence in the potential for a new settlement at the site to be suitable, with the right planning application”.

There are 8 reasonable alternatives. Wisley is included in all of them as “a given” site delivering 2000 homes. See table 6.3 page 39. Note that tier numbers have slightly changed but reflects whether sites are a given or a variable.

Maps show that Wisley former Airfield has a “medium” sensitivity. Although this is based on the Green Belt and Countryside Study 2013, there is no change to reflect the findings that the site is “low to medium sensitivity”.

Of the 8 reasonable alternatives, GBC’s preferred approach is Option 1 which delivers 13,600 dwellings with a 9.4% buffer over OAN. This is the lowest delivery of all options (see table 6.3 on page 39). The SA recognises that Option 1 meets the Borough OAN but is likely to result in unmet need within the HMA.

In terms of drawbacks on option 1, Wisley Airfield is noted to be “particularly sensitive” from a biodiversity perspective but the technical work undertaken, in addition to consultation with Natural England, is noted (para 8.2.2), this is further explored at paragraphs 10.2.4 and 10.2.5 whereby mitigation to reduce impact on biodiversity, is referenced.

Site specific comments in the SA include those on communities (Para 10.4.4) which refer positively to the contribution to community infrastructure, but negatively regarding the distance from a town centre and potential impacts (excluding possible A3/M25 upgrades).

This is further noted in paragraph 10.16.5 where it states that the site does not perform well based on its location, but its scale provides good potential for high quality bus services and cycle routes. Upgrades to the highway network are noted.
Paragraph 10.8.3 refers to the historic environment but notes that there is good potential to mitigate impacts through site specific policies which have been strengthened following the 2016 SA. On housing, see paragraph 10.9.8 which indicates a need for some specialist housing and self built plots on strategic sites including Wisley. A recommendation is included at paragraph 10.19.3 for the site specific policy for Wisley Airfield to ensure that impacts on the SNCI are minimised. The SA for Wisley Airfield is detailed on page 122.

Attached documents:

<table>
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<th>Comment ID: SQLP16/1069</th>
<th>Respondent: 9094753 / D Jones</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: ()</td>
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</tbody>
</table>

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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<th>Respondent: 9293121 / Charlotte Wilson</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: (No)</td>
<td></td>
</tr>
</tbody>
</table>
It seems to me that The Strategic Housing Market Assessment has grossly overestimated the need and I do not feel that sufficient consideration has been given to infrastructure, particularly regarding traffic, to support such huge development.

Attached documents:

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**Comment ID:** SQLP16/806  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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**Comment ID:** SQLP16/1192  **Respondent:** 9323361 / Paul Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()
The previous draft local plan was withdrawn after generating widespread local opposition. Our Mole Valley MP Sir Paul Beresford responded to that; a copy of his comment dated 21 September 2014 is enclosed. His document retains its validity. Sir Paul observed:

“This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough”.

Sir Paul's commentary applies to the revised plan as do other submissions in response to the last draft plan (including my own earlier letter which I attach as well). I object to the revised plan generally for all of the reasons cited in my September 2014 letter in respect of certain sites then earmarked.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft local Plan.

Attached documents:  
- MP response - guidforddraftplan.2014.09.21.pdf (4.4 MB)
- Document.docx (10 KB)

Comment ID: pslp17q/203  Respondent: 9326433 / Keith Kerr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)

I object to the revised plan because the evidence base and the submission documents do not take a fair account of what is required to achieve positive and sustainable growth for a better future for all, including following generations. The plan fails to explain how the current failing services will be improved to meet the demands of a larger population.

The infrastructure must be seen to be working efficiently before you start squeezing more homes into an already congested site.

The proposed number of new homes (12,426) does not reflect the will of the current population and the number would appear to be greatly excessive when taking the result of the EU referendum into account.

The number of affordable homes is inadequate for our needs, and the cost of these homes is far to expensive for anyone on an average salary. How can you legally describe them as being affordable?

The alterations to the plan seem to make it easier for developers to build lower quality and less energy efficient homes. Zero-carbon homes can be built and these should be an essential element of your policy. All developers should have to produce detailed construction plans and energy use calculations for their proposed development. This should include the carbon cost for the source and the manufacture of the raw materials used in the construction, the lifespan and maintenance of the homes together with risk assessments for carrying out alterations or demolition. We need this information so that we can be seen to be protecting the future for following generations and making our best efforts to avoid global warming.

Attached documents:

Comment ID: SQLP16/1956  Respondent: 10270913 / ECA (Martha Covell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
A. This submission

Thank you for requesting our comments on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites 2016. We act on behalf of Top Real Estate Group (TREG Consulting) owners of a potential site off Effingham Common Road and wish the comments in this letter together with the following documents to be taken into consideration in taking this plan forward.

This submission comprises the following:
• Draft Masterplan
• Site Location Plan
• Draft Planning, Design and Access Statement
• A Green Belt Assessment of Effingham Village
• Phase 1 Sustainability Appraisal
• Phase 1 Ecology Assessment
• Transportation Appraisal
• Transport Accessibility report

B. Background

We have been developing proposals for a strategic site in Effingham on a long-term basis and have been a stakeholder in the emerging Guildford Local Plan and Effingham Village Neighbourhood Plan.

Our proposals for the site at Effingham are at an advanced stage and a pre-application enquiry was made in 2015. Details of these proposals are set out in our draft Planning, Design and Access statement.

C. Previous representations

Set out below is a summary of the representations we made to the emerging Local Plan in 2014 and evidence base:

• 1) Guildford Borough Council failed in their duty to co-operate because there is no evidence that they have taken our previous submissions, in particular our SHLAA submission, into account;
• 2) The evidence base is unsound because the methodology adopted for the Green Belt and Countryside Study (GBCS) is inconsistent between different sites and parcels of land and the GBCS and SHLAA conflates the distinctive roles of each;
• 3) The SHLAA is unsound because it has not made an objective and consistent appraisal of each site. Instead it has been informed by the GBCS. This is contrary to the NPPG, which confirms that sites with existing policy constraints should be included and previous constraints should not be accepted;
• 4) The GBCS is unsound because it fails to apply a significance test to the review of various land parcels; the parcels are too large; little weight is attached to the ‘5 purposes of the green belt’ contrary to paragraph 80 of the NPPF; there is an inconsistent analysis of settlements gateways and inconsistent approach to the creation of ‘new defensible green belt boundaries’;
• 5) The Borough Wide Strategy relies on the allocation and development of Wisley Aerodrome, yet this is an isolated location and does not represent a sustainable form of development. The site is a designated SPA and nature conservation area. The open and linear character of the site, does not lend itself to development. The allocation of areas around villages is preferable as these are more sustainable locations for development;

(6) The Rural Exception Homes should be more flexible to accommodate ‘enabling development’ and alternative models of housing delivery, such as ‘community right to build’ and ‘community land trusts’;
• 7) Villages and Major Previously Developed Sites proposes new boundaries to settlements and the green belt, based on inadequate analysis in the GBCS which is unsound;
• 8) Green Belt and Countryside is based on an unsound and inadequate evidence base;
• 9) We object to the allocation of Wisley Aerodrome as it is based on an unsound evidence base;
• 10) We object to the identification of land north east of Effingham Village as a Potential Development Area (PDA) on the grounds that it is contrary to Paragraph 80 of the NPPF, as it serves a number of green belt purposes, contrary to Paragraph 85 of the NPPF as it fails to define a defensible green belt boundary, the development will have a detrimental impact
on the character of the eastern and northern ‘settlement gateways of Effingham’ and the scale of development does not relate proportionally to the scale of Effingham Village and does not represent a sustainable form of development.

D. The Emerging Guildford Local Plan 2016
The following policies of the emerging Local Plan 2016 are relevant to the consideration of the proposals at Upper Leewood Farm:
• Policy S2: Planning for the borough – our spatial development strategy
• Policy H1: Homes for all
• Policy H3: Rural exception homes
• Policy P2: Green Belt
• Policy P5: Thames Basin Heath Special Protection Area
• Policy D1: Making better places
• Policy D2: Sustainable design, construction and energy
• Policy D3: Historic Environment
• Policy D4: Development in urban areas and inset villages
• Policy I3: Sustainable transport for new developments
• Policy I4: Green and blue infrastructure

We specifically have concerns about the following policies:

• Policy S2: Planning for the borough – our spatial development strategy
• Policy H1: Homes for all
• Policy P2: Green Belt

Attached documents:

Comment ID: SQLP16/217  Respondent: 10616225 / Gloria Shoesmith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

Objection

Attached documents:

Comment ID: SQLP16/1504  Respondent: 10619169 / Wendy Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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Comment ID: SQLP16/221  Respondent: 10634465 / Peter Stratford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: (No)

I object. There is no evidence base for a new secondary school west of Guildford in Normandy/Flexford.

Secondary schools to the west of the borough are under subscribed by approx.700. There are other new secondary schools already approved, the new Technical College, expansions at Guildford County and St.Peters, the new Hoe Valley School. There is a proposal for a 5F secondary school at Rokers, Worpleston.

Even if a further new secondary school was required, it would be better located nearer the borough's centre of population, such as Blackwell Farm.

Attached documents:

---

Comment ID: SQLP16/1784  Respondent: 10638209 / Wendy Rockhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

I object to the methodology of drawing up the plan. Guildford Borough has employed consultants who allegedly have planning experience, but have not taken account of Surrey County Council highway planners views or the costs involved in improving infrastructure, which is currently outside their financial capability

The methodology is also flawed as this plan has been formulated without regard to the Village Neighbourhood plans. Logic would suggest planning is best formed by a bottom up rather than top down approach.

Attached documents:
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<th>Comment ID: SQLP16/649</th>
<th>Respondent: 10641953 / Wiesia Taylor</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td>Answer: ()</td>
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Overall, I OBJECT to this plan. It seems to me that the housing numbers you’re proposing to build are much too high for this area. I don’t understand all of the analysis you’ve presented to justify them, which all looks so complicated that I suspect the authors try to make it deliberately confusing on purpose. But my feeling on this is that GBC have put forward a plan that not many people want, apart from the town planners. If the Government is forecasting population in this area will rise by 15%, how on earth can GBC put forward a plan to increase its housing stock by 25%? Also, given that so much of the Borough is Green Belt, why isn’t this taken into account? The majority of the land for housing is coming out of the Green Belt, which is just plain ridiculous.

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/254</th>
<th>Respondent: 10717985 / Alison Drennan</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td>Answer: (No)</td>
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I absolutely DO NOT agree that the plan, strategy and sites are based on up-to-date, relevant data or evidence.

The data used by GBC contains anomalies (e.g. base rates of housing need of students which do not provide a stable base for extrapolation) and relies on assumptions which cannot now be used (for instance rates of growth in employment and need for housing in this area). The assumption of housing need behind the SHMA for example had as a driver inward international migration. This MUST now be reviewed and reconsidered given the EU referendum result. There simply will not be such migration and therefore no need to decimate our beautiful countryside by excessive housing development.

Attached documents:

<table>
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<th>Comment ID: SQLP16/255</th>
<th>Respondent: 10717985 / Alison Drennan</th>
<th>Agent:</th>
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<td>Answer: ()</td>
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</table>

I object to the idea that the evidence base and submission documents are based on up-to-date, relevant and adequate information.

Attached documents:

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<tr>
<th>Comment ID: pslp17q/77</th>
<th>Respondent: 10717985 / Alison Drennan</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
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<tr>
<td>Answer: (No)</td>
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</table>
The evidence used is wholly inadequate, founded on unsound data and fails to take account of need re: actual housing units required. For instance the figures from the revised West Surrey SHMA (Strategic Housing Market assessment) are misleading and offer an inflated housing target for the Borough of Guildford, in large part because of the transient student population associated with the University. Census data takes term time address as permanent places of residence and housing needs are based on this. Most students will not stay in the area after completion of studies and require housing.

Also GBC proposes to build on Green Belt, and fails to provide evidence of exceptional or special circumstances to justify this WHILST removing Brownfield sites (e.g. A4 and A34). This does not represent adequate planning nor does it provide evidence for their proposals.

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/915</th>
<th>Respondent: 10729537 / Julia Osborn</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer: ()</td>
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</table>

LOCAL PLAN 2016 (strategy and sites document).

I am writing as resident but I am also a Send Parish Councillor. I am concerned that this plan is not sustainable, it is not environmentally sustainable, that the evidence base is unsound and that this Local Plan is not compliant with the National Planning Policy Framework (NPPF) guidelines. I have structured my comments on the proposed submission Local Plan 2016 strategy and sites document into three sections: Section 1, comments on the evidence base, soundness of the plan and legal compliance. Section 2, comments on policies. Section 3, comments on sIlCs.

SECTION 1: Comments on the evidence base, soundness of the plan and legal compliance.

I do not agree that the Local Plan is sound, that the evidence base is up to date or that the plan is legal compliant for the following reasons:

1). GL Hearn’s Strategic Housing Market Assessment (SHMA) proposes building 693 Dwellings Per Annum (DPA). However representations made by Tibbalds Planning and Urban Design consultants on behalf of Send Parish Council illustrate that this number accounts for a buffer of more than 20%. In reality this means allocations are made to provide 910 Dwellings Per Annum (DPA) or 131% of the requirement of the SHMA. The housing figures in the SHMA are therefore inaccurate and unreliable.

2). Guildford Borough Green Belt and Countryside Study is tailored around the Settlement Hierarchy Report and the Strategic Housing Market Assessment Report (SHMA). The Settlement Hierarchy is based on a subjective spatial strategy of large/medium and small villages. With regard to the SHMA, have detailed my concerns as in point 1 above.

3). Guildford Borough Green Belt and Countryside Study is used to rule out sites in GBC Flood Risk Sequential and Exception Test (May 2016) but these sites would otherwise meet the GBC Flood Risk Sequential and Exception Test (May 2016). See Appendix I stages 1, 2 and 3.

4). Guildford Borough Council’s Surface Water Management Plan (SWMP) was produced prior to the approval of planning application 14P02289: Land to the north of Tannery Lane and east of Wharf Lane. This planning application required a drainage strategy to mitigate surface water. This development borders site A42 Clockbam Nursery. As the SWMP preceded approval of this planning application the SWMP is now outdated as an evidence base document to manage flood risk as required by the NPPF with regard to A42 Clockbam Nursery.

5) Each and every site in Send Parish has been added since the Regulation 18 consultation, including a major development of 400 homes at Garlick’s Arch and on/off slip roads on to the A3.
6) The introduction of Garlick's Arch and on/off slips roads on to the A3 have been added so late within a Regulation 19 document that statutory consultees such as Highways England have not had a chance to comment.

7) The Transport Assessment was provided during the consultation period and was not available to inform Councillors at the full Council meeting on the 24th May 2016.

8) Councillors have not been able to scrutinize all documentation, including the OAN figure for the SHMA.

Attached documents:

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Comment ID: SQLP16/707  Respondent: 10733665 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

2. I object to the Strategic Housing Market Assessment requirement of 13860 homes as students and economic needs have been inflated.

Attached documents:

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Comment ID: SQLP16/766  Respondent: 10742945 / Trevor Brider  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

3. I believe that the Green Belt & Countryside Study to be flawed.

Attached documents:

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Comment ID: SQLP16/1094  Respondent: 10750945 / Lorna Crispin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

We do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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**Comment ID:** SQLP16/1442  **Respondent:** 10765249 / Andy & Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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**Comment ID:** SQLP16/1495  **Respondent:** 10769121 / Ali Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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Comment ID: SQLP16/317  Respondent: 10770913 / john prest  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

i object to the 2016 draft local plan

Attached documents:

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Comment ID: SQLP16/1607  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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Comment ID: pslp17q/279  Respondent: 10773825 / Pierre Foskett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents...
### Answer:

As a whole the 2017 plan fails to follow NFFP para 17 core planning principals and does not ‘contribute to conserving and enhancing the natural environment and reducing pollution’. There are fundamental errors made in requirements for housing and employment based on the source documents e.g. SHMA and ELNA. The data sources do not show empirical evidence for the changes in the UK’s housing and economic status after it leaves then European Union. The UK population has voted to make a significant change to the country’s economy and population and the impact of Brexit on the local area must be accurately evaluated or else the entire basis of the local plan is flawed.

**Attached documents:**

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### Comment ID: SQLP16/747  Respondent: 10781729 / Sylvia Williams  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:**

I would question as well how the number of new houses necessary for our village was arrived as this is not revealed in the Plan.

**Attached documents:**

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### Comment ID: SQLP16/1705  Respondent: 10782689 / Murray Dudgeon  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

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### Comment ID: SQLP16/1256  Respondent: 10785633 / Penelope Eagle  Agent:
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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The Guildford Borough Green Belt and Countryside Study and SHLAA and LAA are unsound as set out below:

**Strategic Housing Land Availability Assessment AND Guildford Borough Land Availability Assessment**

- We set out our case for consideration of a ‘sustainable mixed use development’ on a green belt sites in Effingham (Land West of Effingham Common Road (Presumed Site Ref. 1408?)) in submissions made to Guildford Borough Council (GBC) on 15th October 2010 and 19th January 2011 (copy of covering letters enclosed in the appendices) as a result of Guildford’s ‘Call for Sites’. In both cases we submitted planning and landscape appraisals, constraints plans, Transport and Ecological Assessments and schematic master plans. We also submitted an assessment of each sites Suitability, Availability and Achievability in line with the SHLAA Practice Guidance. We confirmed that both sites could be delivered within 6 – 15 years and we requested due consideration in the ongoing review of the SHLAA and Green Belt and Countryside Study.

- However the SHLAA failed to include an assessment of the site submitted. We set out further concerns and copied our original submission to GBC in a letter dated 10 September 2013. Yet the updated (2014) SHLAA still failed to include an assessment of this fringe site and the published report offers little robust justification as to why this is the case.

- The Guildford Borough LAA (2016 and Addendum 2017) does include a list of ‘Green Belt, Discounted Sites’. We can only assume that our site is included as Site Ref: 1408 'Land West of Effingham Common Road'?
• Regulation 18 (3) of the Town and County Planning (Local Planning (England) Regulations 2012 places an obligation on GBC to consider all representations to the Local Plan. This states that “in preparing the Local Plan, the planning authority must take into account any representations made to them”. Having reviewed all documentation in detail, our submissions to the SHLAA ‘Call for Sites’ are and remain ‘invisible’.

• Normal practice is for all sites offered in the SHLAA ‘Call for Sites’ to be assessed. This allows an objective and consistent appraisal to be made initially of each site, unconstrained by (but still mindful of) existing local policies. This establishes what land supply there may be available to meet development needs and provides a transparent comparison of options available to meet these needs. This initial appraisal of sites then further be tested for allocation through the Sustainability Appraisal process.

• The SHLAA sets out the sources used to identify sites and confirms that this included information from the Green Belt and Countryside Assessment (GBCA). However the SHLAA itself provides no real justification for the methodology followed and it appears that the GBCS has had an overbearing and unjustified influence on the SHLAA assessment criteria. When we questioned officers directly, GBC provided the following justification for the exclusion of certain sites in the SHLAA by stating (email of 2nd November 2011, Heather Sandell to Martha Covell). ‘Please be aware that the SHLAA is being informed by the Green Belt and Countryside Study. ……”It is not possible to obtain the SHLAA assessment sheets as the work on the SHLAA is still in progress. For sites outside of the village settlements and urban areas, the Green Belt and Countryside Study is effectively the assessment sheet. If sites are not identified in the Green Belt and Countryside Study as potentially suitable for residential development, no further assessment work is required.” A further email on 22 August 2013 states ‘All land in the Green Belt cannot possibly be suitable for development, if it were, it would of course undermine the whole purpose of the Green Belt. We have used our GBCS to test suitability of land suggested to us that is in the Green Belt.’

• The NPPG (6/3/2014) sets out the methodology that should be undertaken in preparing housing and economic land assessments. In relation to Stage 1 ‘How should sites/broad locations be identified? It states: ‘When carrying out a desk top review, plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development (including those existing sites that could be improved, intensified or changed). Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them. Plan makers should not simply rely on sites that they have been informed about but actively identify sites through the desktop review process that may have a part to play in meeting the development needs of an area.’

• Whilst the SHLAA does not allocate sites, there can be no justification for the rejection of sites from further assessment within the SHLAA, based solely on their inclusion within current green belt boundaries, which as the Local Plan Issues and Options version, confirms in paragraph 6.5, establishes the special circumstances to require the green belt boundaries in the Borough to be reviewed. It remains our view that the GBCS and SHLAA evidence conflates the distinctive roles of each and contrary to the purpose of each study.

• On this basis, the Local Plan process fails to comply with Regulation 18(3) and the emerging plan is unsound as there is no evidence that GBC have had regard to any of our submissions and made an appropriate assessment of all sites, including fringe sites. This is contrary to guidance contained within the NPPG.

**Guildford Borough Green Belt and Countryside Study**

• GBC’s methodology is that if sites are not identified in the Green Belt and Countryside Study (GBCS) as potentially suitable for residential development, no further assessment work is required and the site is excluded also form the SHLAA. Hence the Green Belt Study is critical. Despite the significance of the document, GBC have not consulted on the study (unlike Mole Valley who consulted on the GB Review methodology) and the weight that can be attached to it is therefore limited. We object on the grounds that the Council have failed in their legal duty to co-operate in this respect.

• Paragraph 1.3 of the 2013 Summary Report confirms the key requirement of the study is to inform Local Plan options by assessing ‘sustainable locations for green field release’. Whilst ‘sustainability’ is the golden thread...
running through plan making and decision taking process (Paragraph 14 of the NPPF) the methodology adopted
in the GBCS gives little weight to the five main purposes of the green belt as set out in the NPPF (paragraph 80).
• We acknowledge there is no statutory guidance and methodology for undertaking a green belt review. But since
the commencement of the Guildford Green Belt Study in 2009, there has been a considerable quantity of
emerging practice to illustrate a sound approach.
• The Gloucester/ Cheltenham/ Tewkesbury (GCT) Green Belt review for example contains an examination of
practice much of which is endorsed as being soundly based. This review identifies parcels of land for assessment
purposes and then assigns a significance rating to the contribution of each parcel against each green belt
purpose. It makes no further technical assessment.
• This approach differs greatly from the Guildford GBCS, which judged each parcel against the Green Belt
purposes on a Yes or No basis, rather than a comparative rating. It then identifies potential development areas
based on environmental capacity and accessibility, the latter offering no quantifiable evidence. Further more the
parcels of land assessed are large and in themselves have a diverse character. The parcels pay little regard to
physical features that can define green belt boundaries and therefore the assessment is contrary to paragraph 85
of the NPPF and is unsound.
• The approach blurs the distinction between the Green Belt assessment process and decision-making. Such
considerations are better dealt with as part of the testing of potential development areas, when a wider range of
factors can be taken into account within the remit of the sustainability appraisal.
• It is clear that the failure to apply a significance test to the review of parcels in the GBCS has resulted in many
parcels all scoring well in green belt terms and hence undermining the reviews principle purpose. A yes/no
judgment is an unsound approach and ‘scoring’ parcels which the GBCS mistakenly has done, does not enable
any differentiation between the significance of parcels and hence the impact of development on green belt
purposes.
• This is illustrated for example throughout the commentary on Potential Development Areas (PDA) in Volume 1
of the GBCS, which repeatedly states that green belt purposes are not significantly compromised (e.g. Table
1.27 “D10 and E9 provide opportunities to accommodate appropriate development without significantly
compromising green belt purposes). No test of significance has been applied in aggregate to the green belt
purpose of each parcel and hence renders the exercise ineffective and this point is acknowledged in GBCS Vol.
1 paragraph 1.8: “If the high scoring parcels were removed from consideration it would have meant a number of
villages could not have included a PDA...it was considered that to initially exclude villages from being able to
accommodate a PDA as part of this Study may conflict with subsequent spatial strategies identified by the
Council”. Similar points are also made in Volume 3 paragraph 10.2 and 10.3.
• Parcel E9 and the identification of PDA E9-B is a good example of the unsoundness that results from the
approach adopted.
• The Environmental Capacity Analysis for Effingham, as contained within Volume III provides inconsistent
analysis of the settlement gateways and the existing and proposed ‘defensible green belt boundaries’. It states:

‘Open ground is located to the north of Leewood Way and Lower Road. Access to the open ground to the north of
Leewood Way (TREG consulting site) is limited and potential development is considered to conflict with the perceived
settlement ‘gateway’ on Effingham Common Road. Open ground to the north of Lower Road and the horticultural
nursery is framed by mature tree belts and woodland at Thornet Wood’.

• This analysis is incorrect for three reasons, namely:
• (1) the open ground located to the north of Leewood Way (TREG Consulting site) benefits from direct access
off Effingham Common Road and also direct access from some of the rear gardens off Leewood Way;
• (2) The master plan proposals developed by TREG Consulting show that the proposals could preserve and
enhance the ‘perceived settlement gateway’ due to the high embankments, established tree belts and sensitive
design features;
• (3) The mature tree belt to the north, east and west of the Leewood Way site (TREG Consulting site) is not
identified , even though it comprises ancient woodland to the east, a road to the west and a mature tree belt and
embankment to the north. This compares with the Lower Road site , which gives Thornet Wood considerable
weight and allocates it as a potential ‘defensible’ green belt boundary.
  ◦ Secondly the analysis in Volume III identified two ‘settlement gateways’ to the north and east of
Effingham, yet the analysis is given different weight as the site adjacent to the eastern gateway is
identified as a PDA and the site to the north is not. Indeed the analysis of the eastern gateway (Lower
Road) confirms that this gateway plays a more significant role than the northern gateway (Effingham Common Road) as this comprises open ground and is within the Effingham Conservation Area. It states: ‘East: The perceived settlement gateway is located along Lower Road and the A246 Guildford Road to the east of the village…. Open ground to the east of the village maintains separation between Effingham and Little Bookham to the east. This open ground is also located within Effingham Conservation Area’.

- Volume IV of the GBCS starts to define new Green Belt boundaries. Stage 2 ‘Assessing the locations for potential Green Belt defensible boundaries surrounding each village within Guildford Borough’ lists defensible green belt boundaries ‘which provide physical and/ or visual separation to the wider Green Belt’ but the features listed are very inconsistent and the assessment is subjective. For example in the Effingham Assessment, the boundary ‘2R’ is a fence line. But in reality this is a very low fence at the end of residential properties and has been taken down and includes gates in some situations. The edge of the urban area is very ‘raw’ and evident in landscape terms here and this is not actually a very defensible green belt boundary. In contrast, the fence lines and boundary walls near to ‘2B’ on the opposite side of Effingham Common Road have been disregarded. Instead Thornet Wood ‘2A’ a considerable distance to the north, has been taken into account.

- The TREG Consulting site, on the west side of Effingham Common Road has tree belts/ woodland surrounding it to the north, east and west yet these, with the exception of the woodland, have all been disregarded.

- We have also noted inconsistencies in the GBCS e.g. the assessment of development impact on village ‘settlement gateways’. Of the 37 ‘settlement gateways’ identified in the GBCS, only one gateway to the north of Effingham on Effingham Common Road, adjacent to TREG Consulting site, has been assessed for development impact. Either such an assessment (which as we have set out, we consider strays beyond the scope of a GB review) is made against all ‘settlement gateways’ or not at all. As it stands, this is clearly an inconsistent use of evidence and wholly unjustified.

- We have undertaken our own Green Belt Assessment of Effingham based on testing significance and have submitted copies with this representation.

- On the basis set out above, we consider Volumes 1 to 5 of the GBCS are unsound and lack sufficient robust justification for the identification of Potential Development Areas within the Green Belt. To make the GBCS sound we recommend the adoption of the significance test as we have outlined and submitted in reviewing the published green belt recommendations.

Attached documents: 131122 EFFGreenBelt.pdf (1.0 MB)
not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.

The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patters in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford. We believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

Attached documents:  Guildford OAN Review.docx (44 KB)  Guildford OAN Review.docx (44 KB)
The evidence base is not up to date or adequate.

The documents of the evidence base were subject to continuous change without notification and it has been impossible in some cases to track the changes in order to identify significant and material change, making it impossible to evaluate if the change makes the document adequate or relevant. The evidence base was and is not ready for public consultation if there is no way to track what was said previously in so many documents of the evidence base, therefore no basis on which to judge adequacy and relevance to the current draft local plan.

For example, GBCS Vol 4 tables of scores for the contribution of each land parcel to the five purposes of the Green Belt showed one basis of evaluation in the version published in February 2013 and where this failed to support the pre-determination of GBC, the basis of evaluation was changed in the version published in April 2014 reducing the perceived Green Belt protection of the land parcels, making it easier to argue for their qualification as land for housing development. This does not make the document up-to-date as the basis of measurement and evaluation has changed; this is ‘moving the goal posts’ not improving ‘up-to-date-ness’.

The Habitats Regulation Assessment and Sustainability Appraisal were released after the plan was approved by the full council on 25 April 2016. The lateness and content demonstrate the inadequacy with which this plan has dealt with environmental matters. Neither document was immediately available on the website, so early responses sent to the council before these were released could not have taken account of the environmental issues. The Sustainability Appraisal is written by a commercial development company with worldwide reach AECOM and fails to be critical in any way and the document reads more like a public relations release.

The draft SHMA for Guildford has been proved inadequate. A study of the work of GL Hearn in compiling the housing forecasts to provide Objectively Assessed Need [OAN] by NMSS (sponsored by Guildford Residents Associations indicates shortcomings in methodology and lack of rigour in assessing available ONS statistics and misinterpretation of market signals. Therefore, any Policy that claims its content as evidence for the Policy is immediately thrown in to question and suggests it is unsound.

The Settlement Hierarchy evidence has been changed three times, with a second questionnaire submitted to Parish Councils to better record available services. Attempts to conflate settlements as defined by 2003 Local Plan settlement boundaries into small, medium and large villages was abandoned after the methodology was revealed by residents for the sham it was. The transposing of the new questionnaire content has been poor, with errors remaining. Now that the new data fails to match the pre-determination required by the council, the evidence has been quietly shuffled aside and not referred to in detail in the current draft. However, it remains in the evidence base.

The whole process has been one surrounded by obfuscation, with residents having to resort to Freedom of Information requests to obtain essential information freely released by other LPAs e.g. what constitutes ‘exceptional circumstances’. This does not bode well for the Proposed Submission Local Plan to be submitted for examination in public.

Attached documents:

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<tr>
<th>Comment ID: SQLP16/16</th>
<th>Respondent: 10799489 / Shai Sinai</th>
<th>Agent:</th>
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<tr>
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<td>Answer:</td>
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I object, GBC have failed to provide sound evidence.

Attached documents:

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<th>Comment ID: SQLP16/568</th>
<th>Respondent: 10802177 / roger harrison</th>
<th>Agent:</th>
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Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

The plan fails honestly to define Guildford, which is a part of London's hinterland, refuses to explain the basis on which "housing need" has been assessed, and is attached to dishonest claims to protect the Green Belt. Complexity of argumentation disguises the reality that the Plan clears the way for massive development in the Green Belt.

Attached documents:

Comment ID: SQLP16/573  Respondent: 10802177 / roger harrison  Agent: Vail Williams (Suzanne Holloway)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

The evidence base has been hidden from the citizenry on the crucial issue of housing need assessment. For Garlick Arch no evidence worth the name has been provided. The recent commitment by the UK Government to exit the EU and to impose substantial controls on migration must fundamentally change any assessment of housing need in the South East.

Attached documents:

Comment ID: SQLP16/1044  Respondent: 10808833 / David Brandon  Agent: Vail Williams (Suzanne Holloway)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

Please see attached statement.

Attached documents: final rep wellington house July 2016 (3).docx (1.1 MB)

Comment ID: SQLP16/1370  Respondent: 10809377 / Bernice Williams  Agent: Vail Williams (Suzanne Holloway)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents' Association and David Reeve) show it is set far too high and so
cannot be said to be adequate, up to date or relevant. In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account. The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

**Comment ID:** SQLP16/130  **Respondent:** 10815681 / Penelope Corlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

This proposal has increased the number of houses since the April 2016 proposal 300 houses and has added a four way road junction on to the already congested A3 which requires a full consultation under Regulation 18.

**Attached documents:**

**Comment ID:** SQLP16/1440  **Respondent:** 10816993 / Jane Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

**Comment ID:** SQLP16/66  **Respondent:** 10818241 / Vanessa Birchall-Scott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (Yes)
I object to the plans for which the evidence base appears to have been massaged in order to indicate a robustness which is not there. The figures for the number of houses required are unnecessarily high especially when the so called evidence is being used to support building on green belt land. It begs the question what green belt means to the Council when there appears to be an enthusiasm for building a case to support this.

Attached documents:

Comment ID: SQLP16/718  Respondent: 10818337 / Jim Hartley  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  
Answer: ()  
Neither should development be in a scatter-gun fashion with simultaneous developments across multiple sites by several developers. Developments should be approved on an individual site-by-site basis phased to meet demand as it is established. Simultaneous development across multiple sites would create an open property market which encourages occupation by people moving into the Green Belt to live and commuting outside the area. Again your Plan contains no detail on the methodology by which individual sites would be released to developers.

Attached documents:

Comment ID: SQLP16/719  Respondent: 10818337 / Jim Hartley  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  
Answer: ()  
In conclusion my objection to the current Local Plan is not based on what it does contain, debatable as that may be, but on what it evidently omits. This Plan is basically a consultancy report which defines a theoretical future demand and one possible means of satisfying this demand. It is devoid of any alternative solutions or any detailed strategy or policies by which future demand may be measured. Even if demand can be quantified it relies very heavily on the vagaries of the current Planning Consent process to provide any level of monitoring or control during the implementation stage. As such it is an incomplete Plan. The availability of suitable housing in the right quantity whilst protecting the Green Belt is too important an issue to be approved on the basis of this Plan. I recommend the Plan be withdraw and that Guildford Borough Council be tasked with expending as much energy and effort on producing detailed proposals for the measurement and management of future developments as they have previously spent on calculating and justifying the demand.

Attached documents:

Comment ID: SQLP16/722  Respondent: 10829281 / Kevin Nicholls  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  
Answer: ()  
I object to the lack of any evidence for the alleged housing need numbers.

Attached documents:
Comment ID: SQLP16/378  Respondent: 10834081 / Stephen Vincent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Don't agree

Attached documents:

Comment ID: SQLP16/535  Respondent: 10835425 / Andrew Luyten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

Whilst there seems to be broad agreement for the Guildford 'demographic' OAN arrived at by the 2015 SHMA, the increase to this figure to support economic expansion, improved affordability and additional student housing has been vigorously disputed. There is credible analysis questioning the validity of this 'uplift'. As the SHMA is such a key part of the evidence base underpinning the plan some attempt should be made to resolve the differing views prior to submission, rather than just hiding behind an excuse of commercial sensitivity.

Attached documents:

Comment ID: SQLP16/1866  Respondent: 10843457 / Kelvin Hayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Please see my personal objection to this flawed and unbalanced local plan.

Attached documents:

Comment ID: SQLP16/686  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Evidence Base and documents:

I do not understand how the figures for the number of properties required for the Borough have been arrived at. The information from the Strategic Market Housing Assessment [SHMA] belongs to Guildford Borough Council but no explanation has been given as to the calculation of figures or the model used. The assessment and calculation process has not been transparent. These figures, however they were arrived at, are now invalidated by Brexit.

I strongly object to the disproportionate amount of development proposed for the east of the borough, the Horsleys, Wisley, Ockham, Ripley and Send. The proposed developments of A25, A35, A36, A37, A38, A39, A40, A41 and A43
do not respect the character and density of housing in the area, a requirement of The National Planning Policy Framework (NPPF).

Attached documents:

Comment ID: SQLP16/62  Respondent: 10846241 / John Ford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object to the evidence submitted as it contradicts previous employment land needed (ref.ELNA 2015). Also the housing requirement has been exaggerated by wrongly inflated intake of foreign students. Additionally the green belt should not be utilised when there are brownfield sites available.

Attached documents:

Comment ID: pslp17q/175  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()

The evidence base is deeply flawed, especially the GL Hearn SHMA. Independent analysis by Neil McDonald of NMSS demonstrates that the SHMA conclusions significantly overestimate future housing need in the HMA, especially within the Guildford area.

The 19 page report by NMSS (a copy of which is attached) shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

Attached documents:  Review of GL Hearn's Guildford Addendum to the West Surrey SHMA.pdf  (1.2 MB)

Comment ID: pslp17q/95  Respondent: 10849857 / Steve Giles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()
Ref: Guildford Borough Transport Strategy 2017

I am a Guildford resident and a professional transport planner, with a consultancy practice on the Surrey Research Park. Having read the 2017 Borough Transport Strategy, my key comments are as follows:

1. I wholly support the proposed A3 Guildford tunnel as the only satisfactory long-term mitigation of the severe road safety, environmental (air quality, noise and severance) and economic (congestion) impacts associated with the existing A3.
2. I support short term measures to improve safety on the A3 through Guildford, but proper noise mitigation measures (i.e. a complete acoustic fence) should also be implemented to protect residents living near the A3.
3. I strongly support measures to improve sustainable modes of travel in and around Guildford town centre, including the reallocation of space to pedestrians, cycles and buses. Please also encourage more use of car clubs in the town.
4. More short and long stay car parking on the edges of Guildford town centre, combined with restricted vehicle movement in some streets, would reduce unnecessary car trips into the town centre. In principle, I would support a town centre congestion charge/road pricing system.
5. More joined-up cycle routes should be implemented to facilitate cycling within and through town centres, whilst wider routes should be available to the more ambitious cyclist between towns.
6. I am unconvinced by what I have read and heard so far in relation to mitigation of transport impacts arising from the proposed Blackwell Farm allocation, particularly in the absence of an A3 tunnel. If it proceeds, the development needs to be genuinely accessible by non-car modes; lip service will not suffice.

Attached documents:

Comment ID:pslp17q/14  Respondent: 10851425 / Andrea Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Answer: (No)

I do not believe the SHMA is sound because it counts overseas university students as permanent residents (their permanent address is given as their term time address - clearly the majority return overseas at the end of their course), these students are also counted as part of international migration; and no adequate adjustment has been made for the discrepancy between the 2011 Census and the population forecasts.

Attached documents:

Comment ID:pslp17q/214  Respondent: 10853697 / John Lobley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Answer: ()

I note that in the Revised Local Plan (“RLP”) that there has been a small reduction in the proposed number of houses to be built on the green belt sites, although in the main the sites themselves continue to be earmarked for development at a level which is totally unsustainable for the existing community. I attended a presentation at Tongham and asked numerous questions to the Council staff (Mr Spooner was not present) and was not given any satisfactory responses. There was no presentation at Sutherland Park and this omission is remarkable considering the impact of the Gosden Hill Farm (“GHF”) on the residents of Burpham, of which I am one. As such a resident I know first-hand the impact of an additional 5,000 vehicles (from 2,000 new houses) on the already clogged-up narrow roads, in particular Clay Lane which
under an additional threat from the Slyfield Regeneration Plan. It is clear that the Council is adopting a plan of “housing first, infrastructure second” as there is no clear plan to ease the traffic other than token gestures such as a new station and park-and-ride (which nobody uses anyway).

I ask that the greenfield sites be removed from the plan, not out of NIMBYism but out of a genuine and deep-seated concern over the effect on the existing community.

Attached documents:

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Comment ID: SQLP16/1965  Respondent: 10856801 / Jennifer Tigwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Having lived my entire life as a Surrey Resident I am extremely concerned as to the level and extent of development being proposed for Surrey.

Surrey has always been to me a county of outstanding natural beauty -this needs to remain so.

Surrey has beautiful villages clearly defined by separation by areas of fields & woodlands-this needs to remain so.

The proposal for the developments in and around Ripley & Send and the proposal that they should be removed from the Green Belt will urbanise these villages and in effect will morph both Woking and Guildford together.

Our local services, roads and Doctors Surgery cannot deal with any further increase in development.

Attached documents:

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Comment ID: SQLP16/1227  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment (SHMA) overstates housing need. The Green Belt and Countryside Study uses a flawed approach. The Transport evidence is too late and incomplete to inform the Plan.

Attached documents:

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Comment ID: SQLP16/1399  Respondent: 10868609 / Robert Lockie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object to the fact that at the GBC meeting where the vote was taken to put forward the proposed local plan for consultation, in this enormous document, there were many pages blank where ‘TBA’ was the only thing on the page and
councillors were told that these would be sorted out later (or words to that effect). How can councillors, mainly Conservatives, vote for a proposed plan to be put forward when they did not have full facts at their disposal?

Attached documents:

Comment ID: SQLP16/1400  Respondent: 10868609 / Robert Lockie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

- I object to the lack of evidence that Guilford has a need for the housing numbers proposed and that information about how GBC reached this conclusion is not transparent and the even borough councillors have been refused this information. What on earth is going on that it has to be so secret?
- I object that, along the same lines as above the 2015 SHMA assessment should be called into question. The use of numbers of foreign students has been used to add to housing needs and therefore inflates the number of houses needed. If the population is to grow by the amount predicted then only approximately 8000 homes will be needed and not 13860
- I object because, given the above figure of approximately 8000 homes needed 50% of these could be built on brownfield sites
- I object to the lack of sound evidence for expansion given that the ENLA assessment 2015 shows an 80% reduction in employment space from the previous ENLA of 2013: therefore industrial space at Burnt Common would not be needed

Attached documents:

Comment ID: SQLP16/76  Respondent: 10870305 / Rosalyn Vickery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: (Yes)

I object because there has been no local consultation on the latest plans which are radically different to the ones which were proposed and consulted on in 2014.

I also object because the evidence for the number of houses required has not been published and it appears to have been greatly exaggerated.

I also object because the proposals are for building on greenfield sites rather than the brownfield sites that we know are available.

Attached documents:

Comment ID: SQLP16/3  Respondent: 10871169 / Lynn Durbridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: (Yes)
I object to the evidence given by the GBC with regard to Send and Ripley, there is no longer a need for more industrial space and the supposed number of houses needed has been greatly exaggerated. In fact the Green belt does not have to be built on at all. there are brownfield sites available, I believe this is being pushed through for purely monetary reasons, not for true need and does not protect the environment. The roads through Send cannot cope as it is, the proposed plan would cause a constant gridlock and would be unmanagable. This new proposal is just that, a new proposal and should be treated as such, and should warrant a full consultation under Regulation 18.

Attached documents:

Comment ID: SQLP16/1923  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I OBJECT to Guildford Borough Council’s Local Plan on the grounds that it represents serious overdevelopment, is based on inaccurate, unscrutinised housing figures, and means a massive, unacceptable destruction of Green Belt land. It would also require a huge amount of infrastructure and attract thousands of extra vehicles, placing undue pressure on local road networks, as well as causing extra pollution.

Furthermore, it would completely change the character of the borough, harm the environment and seriously damage the quality of life for residents. As our local MP has said, the Plan is ‘not fit for purpose’.

Attached documents:

Comment ID: SQLP16/711  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

The housing requirements for the area are not based on correct data.

Attached documents:

Comment ID: SQLP16/712  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

ADDITIONAL Points

We now have Brexit! We do not need to have a continued frenetic pace for provision of housing.

There needs to be a properly fully considered plan which includes full provision for the necessary infrastructure to be in place at the same time, if not before additional housing is approved. It is not only untenable what is currently proposed, it is also highly irresponsible! It is akin to Tony Blair taking us into a war with Iraq before putting plans into place for what happens AFTER the war. Can we sue Guildford Borough Council or all the individual councillors then? The issues that I can immediately think of, but not limited to, are as follows:
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<th>Comment ID: SQLP16/733</th>
<th>Respondent: 10877409 / Peter Lipscombe</th>
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<td>You have not proven the need for such a drastic increase in housing requirements.</td>
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<td>3. I believe your housing calculations – 693 per annum to be questionable, and in need of clarification in order to make them more acceptable and transparent.</td>
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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/938  Respondent: 10892353 / Robert Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: (Yes)

N/A

Attached documents:

Comment ID: SQLP16/599  Respondent: 10915937 / Rona Lester  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: (No)

I write with regards to the Horsley’s and Wisley airfield development proposals. I understand you used a consultant to come up with the numbers of housing required which did not provide its model of how they came up with their figures. I also understand that the council increased the consultants figures which is almost 70% higher than the official national estimates for population growth in the Borough. I doubt the veracity of these figures you are basing these proposals on and would ask, in light of the BREXIT vote that you reconsider the long term housing needs for the entire Borough.

Attached documents:

Comment ID: SQLP16/1234  Respondent: 10928737 / Guy Pashley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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In addition, the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/725  Respondent: 10928769 / John Slatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

What evidence is there to show that all these new homes are needed.

Attached documents:

Comment ID: SQLP16/395  Respondent: 10934497 / Paula Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

The evidence has not been proven, or revealed in the plan to the general public or the GBC.

Attached documents:

Comment ID: SQLP16/1263  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

---

**Comment ID:** SQLP16/1264  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

---

**Comment ID:** SQLP16/664  **Respondent:** 10952705 / Moira Maidment  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

I **do not agree** that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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In addition, the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be reassessed, and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

**Comment ID:** SQLP16/833  **Respondent:** 10957025 / Pauline Masters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

1. **Questions posed by Guildford Borough Council as part of its consultation.**

Questions from GBC

24.A. **Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/81  Respondent: 10957441 / Christopher Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object

Attached documents:

Comment ID: SQLP16/88  Respondent: 10957441 / Christopher Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I object to A43 policy at Garlick's Arch.

this is GREENBELT land and is permanently protected by NPPF to prevent merging of settlements.

This site is new and was not consulted upon previously. GBC have not followed correct process re consultation. They have acted in dishonest, underhand manner and one has to wonder what personal benefits some councillors are incentivised by?

there is no evidence that housing and employment space needed at this site.

if it is required at all in the borough - which it isn't - then Slyfield would be more appropriate site - land surrounding Garlick's Arch and Burnt Common is precious GREENBELT land. There are ancient trees and an abundance of precious wildlife.

A new 4 way interchange onto A3 would be disastrous for Send, Ripley and Guildford. The traffic congestion is already problematic and congested and dangerous in peak travel times. Send and Ripley would become more of a through route than they can already cope with. Living off Burnt Common Lane it can already take too long to get onto Portsmouth Road and this area has a lot of families with young children and a large amount of elderly people. Do GBC and the Planning Department want a tragic accident to occur in order for them to see sense and realise this proposal (A43) could result in loss of life and/or serious injury?

Infrastructure overload is ignored in this proposal and GBC are ignoring the many brownfield sites available - please DO NOT DESTROY WHAT IS LEFT OF OUR GREENBELT,

i hope the planning department will rise above the foolishness of some council members backing this plan and make the logical and wise decision to say NO to policy A43.

Attached documents:

Comment ID: SQLP16/2015  Respondent: 10958817 / Steve Wright  Agent:
If this development continues I will leave Guildford.

Finally, the consultation process is a joke. I tried as much as possible to take an interest and to present my view but there is far too much jargon used by all concerned which is not understood by the public i.e. SHMAR, SANG, Safe guarded land which means the opposite, etc. The council do not want consultation they just seem to want to push through their original ideas without any discussion. I haven’t seen any of the comments raised in the first round be incorporated into the new version of the local plan.

Attached documents:

Comment ID: SQLP16/1235  Respondent: 10959009 / Rebecca Claridge  Agent:

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/1669  Respondent: 10962785 / Derek Gilmore  Agent:

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Attached documents:

Comment ID: SQLP16/2038  Respondent: 10963233 / Susan Poole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

The Plan is not ready for an inspector.

Attached documents:

Comment ID: SQLP16/2131  Respondent: 10968705 / Hazel Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I OBJECT to the Proposed Submission Local Plan.

The plan proposed a massive amount of housebuilding in the Borough, which will spoil the countryside and the local villages.

Guildford Borough does not need the level of housing development proposed by this plan. The Strategic Housing Market Assessment (SHMA) is flawed.

I object to the proposals to develop many sites that are currently part of the Green Belt. There are no exceptional circumstances for doing this.

I object to the insetting of the villages within the Borough, especially East and West Horsley.

I have grown up in a village in the Borough and I would like to be able to remain here, but the type of housing that will predominate as a result of this proposed local plan will be out of reach to first-time buyers such as myself.

Attached documents:

Comment ID: SQLP16/1536  Respondent: 10972065 / Sarah Cocke  Agent:
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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/1764  Respondent: 10986657 / MC Nominees Ltd  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

Employment Lands Needs Assessment 2015

Attached documents:

Comment ID: SQLP16/1233  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1187</th>
<th>Respondent: 10990145 / Anne Lee</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Attached documents:

| Comment ID: SQLP16/1116 | Respondent: 10992833 / Amanda Verny White | Agent: |
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Comment ID: SQLP16/1325  Respondent: 10998081 / David Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Attached documents:

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Comment ID: SQLP16/249  Respondent: 10998433 / David Daniels  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

I am not happy with the proposed number of new housing units to be built in Guildford, as I do not understand how these figures were calculated. Given the inevitable slowing of the economy due to Brexit, these numbers will also be in need of downgrading. So-called affordable housing is very unaffordable for people trying to get on the housing ladder, any claims that such accommodation is truly affordable are suspect. In fact, should the government not be encouraging growth in the other regions and discouraging it here?

Infrastructure has not been addressed adequately. It should be in place first, and not treated as an afterthought. What about the added in-town congestion that the addition of 13000 new dwellings will bring to an already highly congested...
town centre? From every viewpoint, this plan is flawed and built on absurd assumptions, besides being incomplete in its scope.

Attached documents:

Comment ID: SQLP16/1624  Respondent: 11001249 / Lesley Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

It is proposed to 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 (all not suitable for increased traffic volume) 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”.

A local plan when proposing new housing on a substantial scale must surely plan for the implications of increased traffic both on the major roads such as the A3 and the minor village roads. The current draft local plan has not given such issues enough consideration.

Attached documents:

Comment ID: SQLP16/781  Respondent: 11003361 / Howard Milner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Whilst the need for homes can be appreciated it seems more than a little perverse not to firstly develop Brown Field sites for both industry and residential uses, especially in the light of dubious figures being used to substantiate this need for development.

Attached documents:

Comment ID: SQLP16/1703  Respondent: 11007393 / James Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Attached documents:

---

Comment ID: SQLP16/94  Respondent: 11008033 / Sandra Reeves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

I object as Guildford BC has failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) This showed that the industrial space at Burn Common is no longer needed. That 13860 new houses are required is also an exaggerated figure. The Green Belt does not need to be built on and 50% of new homes needed could be built instead on brownfield sites. GBC's Transport Assessment was not available to councillors for he vote on 24th May whilst infrastructure overload has received little attention.

Attached documents:

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Comment ID: SQLP16/665  Respondent: 11010273 / Dave Brownjohn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Other items

Housing and Employment Need - there seems to be an acceptance by GBC of national policy that population growth should be encouraged and accommodated even in areas such as ours, whereas part of their role is to ensure a comfortable and well ordered environment for existing Guildford residents. This national “obligation” should be challenged, to re-direct population growth and associated industry and commerce to other areas of the UK with less dense populations, thereby encouraging the spread of economic wealth to areas where it is needed.

Attached documents:

---

Comment ID: pslp17q/668  Respondent: 11010273 / Dave Brownjohn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()
Transport

- It is unreasonable to seek approval of a local Plan without clarity on the essential issue of transport and roads infrastructure. The Plan indicates that road improvements will happen, but as some sort of evolving feast as directed by SCC and Highways England. This essential ingredient must be clearly defined for a Plan to be considered properly.

- In particular, the Gosden Hill development and its interaction with the A3 is not realistic. The suggestion of on & off slips to the A3 southbound only is ridiculous, and the alternative proposal by Highways England of a possible multi-direction interchange cannot be left to their discretion and to whether or not some funds can be found (because of course they will not). An integrated A3 multi-direction interchange plan must be part of the developers plan.

- The existing Clay Lane northbound access is just not sufficient, bearing in mind the extra traffic that will be generated by the various proposed housing and commercial developments to the north of the town, as well as Slyfield and Gosden Hill. It should also have some consideration of whether access/egress to Gosden Hill could be via the proposed improved interchange at Burnt Common, avoiding the otherwise inevitable increased congestion in Burpham.

- The current daily gridlock of the Burpham A3 exit slip and London Road seems to have been ignored, as is the gridlock caused every Sunday by the Aldi supermarket launching that week’s new special offers – great for their business but a nightmare for local residents trying to drive in Burpham.

- The proposed changes to the Burpham A3 slip to become 2-way and part of the Sustainable Movement Corridor is farcical! There is no suggestion of any attempt to relieve the current traffic volumes causing the congestion mentioned above (and consequent air pollution), but rather it will be even more congested due to:
  - the thousands per day of Gosden Hill traffic movements coming through London Road Burpham to reach Sainsbury/Aldi and the Northbound A3 access
  - the significant extra traffic movements from the all areas this side of Guildford (incl Slyfield, Merrow, Godalming, Cranleigh and Dorking areas) which will come to Burpham to access the A3 southbound via London Road (to avoid having to crawl through the Boxgrove/Woking Road/Parkway/Ladymead routes to get to the existing A3 Southbound access)
  - the potential massive traffic congestion and pollution in the event of an accident on the A3 southbound, or the new Gosden Hill roundabout or within Burpham itself – there seems to be no contingency for this whatsoever

- I support the Council’s enthusiasm for an A3 tunnel, but this potential traffic solution must also be integrated with the Burpham development plan, as the Burnt Common to A320 section of the A3 must be the likely start point for such a development. This cannot be left to just evolve.

Attached documents:

Comment ID: SQLP16/1138   Respondent: 11010401 / J M Bates   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

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Attached documents:

Comment ID: pslp17q/265  Respondent: 11012129 / William Lawrence  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()

1. Since the release of the Draft Local Plan there have been substantive changes to borough infrastructure, particularly in relation to Burpham, where traffic volume, flows and future predictions have not been assessed.
2. There has been no accurate assessment of pollution levels, particularly in relation to traffic. Since the release of the Draft Local Plan, Burpham has especially seen a massive increase in HGV use, traffic volume and congestion. There has been no corresponding assessment of the impact of the Gosden Hill Farm development upon this activity and no assessment of present and future pollution levels, particularly in reference to WHO guidelines.
3. There has still been no meaningful assessment of current bio-diversity within the borough nor has there been any assessment of the impact of housing and infrastructure development upon this.
4. There has been no accurate feasibility study for the proposed Sustainable Movement Corridor (Burpham). Recent developments have ignored government guidelines and there in insufficient space for this proposal. This project could not be completed without massive use of compulsory purchase powers. (Which Surrey County Council have categorically stated that they would not use).

Attached documents:

Comment ID: SQLP16/222  Respondent: 11016001 / Brenda Tulloch  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

I object to the use of Green Belt land - once its gone its gone forever which will have a huge impact for our future generations.

Also Green Belt is continually used for walking - wildlife - children to play on etc

Attached documents:

Comment ID: SQLP16/548  Respondent: 11025281 / Alan Willmott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)
I object strongly to the proposed submission. The documents supporting this are confused and inadequate. It has been extremely difficult to obtain accurate and objective information from the council.

Attached documents:

Comment ID: SQLP16/728  Respondent: 11032129 / Claire Sinclair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

The need for housing projected over the next few years is far lower than GBC are supposedly making provision for. What you are prosing in effect a 35% increase in housing in two small villages which barely have the facilities and infrastructure to cope with the population as it stands. This is unprecedented and far beyond anything proposed elsewhere in the borough. It is completely unreasonable especially since predicted growth in the area is much nearer 15%.

GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion which underpins all of the housing policies in the Local Plan. GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC and well in excess of the official statisticians’ forecasts. Why are GBC pursuing this aggressive house building project when there is no proof of demand?

Attached documents:

Comment ID: SQLP16/775  Respondent: 11032705 / Mike Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object because GBC have exaggerated the need for the 13,860 house currently in the local plan. A population increase of 20,000 in the plan period would require just 8,000 homes based on 2.5 soles per habitat.

Attached documents:

Comment ID: SQLP16/1639  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.
I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]
The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both

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directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability, and
• flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

Attached documents:

Comment ID: SQLP16/1644  Respondent: 11036289 / Osman Abdullah  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()
Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

Attached documents:

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<th>Comment ID: SQLP16/714</th>
<th>Respondent: 11036705 / Brian Slade</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Specifically:

I OBJECT to the fact that GBC has made major changes to the Plan which require another full consultation under Regulation 18 - not trying to get out of that full consultation by use of Regulation 19. This not only invalidates the whole process - but makes a mockery of it.

I OBJECT to the lack of Evidence supporting GBC Strategic Housing Market Assessment 2015 which is highly questionable and for which GBC has consistently refused to provide details of its calculations despite several requests to do so. I believe that the requirement for 13,860 new homes in the Borough is exaggerated - and even if the population were to grow by 20,000, based on an average family size of 2.5 persons in each home, the need would only be 8000. It would appear that the number of foreign students has been wrongly used to inflate the population need. The Green Belt does not need to be built over to meet that need when 50% of the 13,860 new homes stated as needed could be built on existing Brownfield Sites. GBC's Transport Assessment was not even available to Councillors when the vote on the New Local Plan was put to them on 25th May which again questions the objectivity and competence of GBC and its Planners.

Attached documents:

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I OBJECT to the Lack of Evidence supporting the need for Industrial Development at Burnt Common since the latest Employment Land Needs Assessment in 2015 shows an 80% reduction in employment space need from the ELNA carried out by GBC in 2013. Bearing in mind the significant amount of vacant premises in the Borough and surrounding area there is no need for new commercial and industrial development and the traffic and pollution problems that will ensue because of it.

Attached documents:

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<tr>
<th>Comment ID: SQLP16/713</th>
<th>Respondent: 11037921 / C. H. Morris</th>
<th>Agent:</th>
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</table>
I am writing to formally object to the Guildford Local Plan.

Firstly, the basis on which the target number of new houses is unclear. I have seen no evidence that the assumptions in the Strategic Housing Market Assessment (SHMA) have been challenged or validated in any transparent way. Moreover, in our new context of much reduced expectations for growth following the decision to leave the EU the assumptions in the SHMA need to be revisited.

Attached documents:

Comment ID: SQLP16/1107  Respondent: 11041121 / Catherine Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Question 1: Evidence Base. I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

• The evidence base documents take no account of the radically changed environment and outlook following the BREXIT referendum. This is hardly the fault of the Council but is nevertheless a serious flaw and requires a re-evaluation of the strategic context.
• The Transport Assessment was published at the same time as the Plan leaving little time for study and analysis. The projections contained appear to be quite inadequate in that 1) they average congestion over 3-hour time bands, which materially reducing the impact of congestion and 2) they do not model junctions.
• The “Assessment” shows that congestion will worsen significantly over the period of the Plan even if all the proposed and aspirational infrastructure is built.
• The Strategic Housing Market Need (SHMA) attempts to justify an Objective Assessed Need (OAN) based on a very aggressive desire for economic growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are opaque and have not been adequately scrutinized by Councillors. Consequently people have to take on trust the work of a consultant. In any case, political events have overtaken the SHMA.

The number and complexity of the documents in the evidence base make reading, understanding, analysis and assimilation extremely difficult.

Attached documents:

Comment ID: SQLP16/922  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents
The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

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<th>Comment ID: SQLP16/1665</th>
<th>Respondent: 11044129 / Christopher Barrass</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>
Comment ID: SQLP16/331  Respondent: 11045953 / Victoria Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object to the proposed development as a local resident and feel that Send already suffers from too through traffic between Guildford and Woking.

Attached documents:

Comment ID: SQLP16/848  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

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ANSWER

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.
**Comment ID:** SQLP16/1535  **Respondent:** 11047873 / Mary Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

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**Comment ID:** SQLP16/1137  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.
The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/1461  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

1. I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

   The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

   1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
   1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

   In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

   The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/1966  Respondent: 11063233 / David Ebdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

The information in the draft plan and it’s size may seem too complicated for many individuals to take in but that does not stop ‘us’ understanding the overall policies that you are putting forward. One wonders about the qualifications and experience of the people who have put this plan together. What expertise and experience do they have? What local knowledge have they digested? The fact the Wisley site is still included in the draft Local Plan makes one question the whole ethos of the GBC Executive. The councilors unanimously decided on 14 counts that the site was unsuitable and yet it is still in this local plan.

Attached documents:

Comment ID: SQLP16/1841  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.
1. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

**Question 1: The evidence base and submission documents**

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

**Comment ID:** pslp17q/427  **Respondent:** 11071553 / Nicholas Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** (No)

- The arithmetic behind the housing numbers in the SHMA remains a complete mystery and can’t be tested by either the public or the government because the council refuses to reveal it. The mistakes in the SHMA have been amply explained in at least 2 independent studies which the inspector will have seen, but the SHMA methodology is still taken by the council to produce an “objective” housing number assessment. This has been lifted wholesale into the plan as a policy proposal, when it is merely part of the evidence base and should be assessed and debated critically and transparently. I suspect this would produce a target about 60% lower than the 12,000+ proposed and would immediately solve a lot of objections about building on the green belt etc. I also don’t think the inspector should trust the figures as a fixed target, given the council’s contradictory noises about how development will be phased and infrastructure and other constraints applied. This leaves the final housing number so up in the air as to render this part of the plan useless as a practical policy tool for officers responsible for day-to-day planning. No-one knows for sure what number the council is heading towards or how this aligns with public opinion or government policy. This cannot be deemed “sound”.

**Attached documents:**

**Comment ID:** SQLP16/1470  **Respondent:** 11074465 / Louise Vaughan  **Agent:**
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy, which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
2. SHMA figures, which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
3. The recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

---

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
1. The Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt” however GBC appears to be in breach of this same policy as some 65% of developments will be made on land that is currently Green Belt.

2. I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough. The Office of National Statistics projects a population increase of some 15% for Guildford Borough over this same period.

3. I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

Attached documents:  letter gbc 290616.doc (26 KB)

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object
This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**Infrastructure**

**I object**

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

**The Highway Assessment**
I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF'. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.
The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

**The Spatial Hierarchy**

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

**Strategic Housing Market Assessment (SHMA)**

I Object
The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

**The Land Assessment**

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

**Green Belt & Countryside Study**

I object

GBC’s Green Belt & Countryside Study does **not value appropriately the “fundamental aim”** of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Refer to the accompanying separate representation submission letter dated 15th July 2016 for details.

ASSIGNMENT OF COPYRIGHT
18.1. The Service Provider hereby assigns to the Council all vested contingent and future rights of copyright and all rights in the nature of copyright and all accrued rights of action and all other rights of whatever nature in and to the reports (which shall include all plans drawings documents (writte and electronic) and presentation material and all other material
capable of being subject to copyright produced by the Service Provider in the course of undertaking the Service for the Council) prepared under the terms of the Contract whether now known or in the future created to which the Service Provider is now or may at any time after the date of the Contract be entitled by virtue of or pursuant to any of the laws in force in each and every part of the world.”

As a consequence of this and since the report and various findings represents a very large proportion of the local plan, the entire proposed GBC Local Plan 2017 as amended, is in my view fatally flawed and should be thrown out. Additionally, if were to consider the so called ‘evidence base’ contained in the proposals in this plan, they are contrary to a large portion of the National Planning Policy Framework (NPPF) particulary applying to the Green Belt and proposals for development and change including the disgraceful proposals (original and amended) concerning unapproved boundary changes and ‘insetting’ designed to allow as much development on the Green Belt as possible.

As an example of how the Green Belt including openness should be protected from inappropriate development, there is a recent High Court judgment in the case of R (Boot) v Elmbridge Borough Council [2017] EWHC 12 (Admin) which provides useful clarification on the approach that local planning authorities should take when applying paragraph 89 of the National Planning policy Framework (NPPF) to applications for development within the Green Belt.

This case concerned a proposal to build a new sports centre which local residents where concerned was inappropriate and would harm the openness of the Green Belt. The details are reproduced here:

The claimant argued that if a new sports facility caused harm to the openness of the Green Belt - even limited harm - it was not appropriate development. Mr Justice Supperstone ruled that the first ground had been made out. The judge said the conclusion of the council that the proposal had a “limited adverse impact on openness” of the Green Belt was not a finding that there had been compliance with the policy that required openness to be preserved. “Accordingly even if the adverse impact referred to at para 95 of the OR [officer’s report] is acceptable for the purposes of DM17 [the council’s development plan policy – Green Belt (Development and New Buildings)], it is not acceptable for the purposes of para 89 of the NPPF,” he said.

The judge also accepted counsel for the claimant’s submissions that West Lancashire Borough Council v SSCLG [2009] EWHC 3631 established that if “a proposal has an adverse impact on openness, the ‘inevitable conclusion’ (see para 22 of the judgment) is that it does not comply with a policy that requires openness to be maintained. A decision maker does not have "any latitude" to find otherwise, based on the extent of the impact.”

In the present case, Mr Justice Supperstone said, the defendant council “concluded that there was an adverse impact on openness, but nevertheless granted permission without giving consideration to whether under paras 87 and 88 of the NPPF there were very special circumstances that would justify it.” The High Court judge rejected the second ground of challenge, saying the two proposals were materially dissimilar. The development of a sports centre is not materially dissimilar to building houses and other buildings in the Green Belt and in no way could it be said that such housing development would not harm the Green Belt.

The GBC Local Plan 2017 in its original form and as amended, is contrary to the following NPPF guidelines:
NPPF planning guideline Paragraph 79; NPPF planning guideline Paragraph 80; NPPF planning guideline Paragraph 81; NPPF planning guideline Paragraph 82; NPPF planning guideline Paragraph 83;
NPPF planning guideline Paragraph 84; NPPF planning guideline Paragraph 85; NPPF planning guideline Paragraph 86; NPPF planning guideline Paragraph 87; NPPF planning guideline Paragraph 88; NPPF planning guideline Paragraph 89; NPPF planning guideline Paragraph 90; NPPF planning guideline Paragraph 91; NPPF planning guideline Paragraph 92; and NPPF planning guideline Paragraph 109.

In addition, I object to policies: A25; A26; A27; A28; A29; A32; A35; A37; A38; A39; A40; A42; A43; A44; A58; A49; A55; A56; A57 on the grounds that all these sites earmarked for development and change detailed on the plans and diagrams, are either Green Belt, green farmland, ANOBs, or wrongly designated as urban land when they clearly are not.

The corresponding proposed housing requirements and all related infrastructure including roads; water; gas; sewerage; refuse collection and treatment and telecommunications assessments etc, are hopelessly flawed, inaccurate and in some
cases missing. Additionally, the ‘evidence base’ consisting of thousands of pages of closely written text and graphs/diagrams is so completely incomprehensible to many ordinary people, that most will not even attempt to read or understand it.

It seems to me that real evidence is mistaken for wildly inaccurate assumptions and projections. One might perhaps conclude that this could appear to be a deliberate policy to avoid proper scrutiny, but I am sure this is very unlikely.

In conclusion it is my opinion that the scale and size of development and change as proposed in the Guildford Local Plan is breathtakingly inappropriate and would irrevocably change the whole character and environment of Guildford. Such a plan if approved would allow several ‘medium sized towns’ to be built in the villages and Green Belt areas of the borough. The desire to increase house building and development is not an exceptional or valid reason to build on and destroy the Green Belt land. This has been stated many times in the NPPF and confirmed by several recent legal judgements.

I urge GBC to listen to and heed the views of local people as required by the localism act and reject this ill-conceived and highly damaging proposed local plan.

Attached documents:

Comment ID: SQLP16/1859  Respondent: 12316001 / Vail Williams LLP (Jane Terry)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  
Answer: ()

The following representations are made to the Proposed Submission Plan accordingly:

Question 1: The Evidence Base and Submission Documents

Do you agree that the evidence used for the draft Local Plan: Strategy and Sites is adequate, up-to-date and relevant?

No.

We do not consider that the Green Belt and Countryside Study has adequately assessed the Potential Development Areas (PDA’s) it identified in relation to how those PDA’s fulfilled their greenbelt purposes. The Council has carried out Greenbelt purpose assessments on the larger land parcels and has placed an over reliance on these assessments to inform their spatial strategy. As a result the Council has removed many of the more Sustainable village infill sites between the Reg 18 and Reg 19 draft based on what land parcel they happen to fall within.

The Land Availability Assessment (LAA) has a list of sites that it has discounted for various reasons. There seem to be only two sites on that list that have been considered and discounted as potential dedicated Custom and Self Build sites. We do not feel this is an adequate amount of sites considered.

Attached documents:

Comment ID: SQLP16/1901  Respondent: 12316001 / Vail Williams LLP (Jane Terry)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  
Answer: ()

No.
We do not consider that the Infrastructure Deliver Plan is adequate in relation to the provision of suitable or sufficient SANG.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1974</th>
<th>Respondent: 13579713 / Roger Daniels</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer:</strong> (No)</td>
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No.

The accompanying report points to shortcomings in the Green Belt & Countryside Study as a basis for reviewing Green Belt boundaries and identifying appropriate allocations to meet the objectively assessed need for housing throughout the plan period.

The Land Availability Assessment is not based on a consistent rate of housing delivery that reflects housing requirements and shows a shortfall in housing land supply in the early years of the plan, including the absence of a five-year supply of housing land.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/592</th>
<th>Respondent: 14143457 / Hermes Investment Management Limited</th>
<th>Agent: Turley (P Keywood)</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td><strong>Answer:</strong> (No)</td>
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</tbody>
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Please refer to the Turley letter dated 18 July 2016 submitted on behalf of Hermes for detailed comments.

The letter is uploaded under Question 7 of the Consultation Questionnaire.

The letter addresses concerns relating to the following evidence base documents:

- Guildford Borough ‘Land Availability Assessment (LAA)’ dated February 201
- Guildford Borough Strategic Flood Risk Assessment January 2016
- Sustainability Appraisal of the Guildford Borough Local Plan carried out by Aecom
- Guildford Borough Council Flood Risk Sequential and Exception Test document, May 2016

**Attached documents:**

- HERL2015_LT_180716_Representation_Letter_to_Draft_Local_Plan_on_behalf_of_Hermes.pdf (95 KB)
- HERL2015_Representation_of_behalf_of_Hermes_WaterCo_Flood_Risk_Assessment_w10122160718FRA.pdf (4.2 MB)
The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
3. Redirection of vehicle traffic away from the centre
4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:

- Our 2013 document ‘Guildford on the Way’, a Vision for Guildford in 2030 (attached) as articulated by members of the public, Guildford residents and our members
- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

Attached documents: 2014 LP submission.pdf (948 KB)  Guildford on the Way.pdf (1.4 MB)
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/22</th>
<th>Respondent: 15063745 / John Pryce</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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I object to the way this new Plan has been rushed through. There are significant changes to the old Plan which require full consultation under Regulation 18.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/30</th>
<th>Respondent: 15066369 / Adam Fairbairn</th>
<th>Agent:</th>
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</table>

I wholeheartedly object. The fact that there is a site in the first place for these plans to be proposed is bad enough. There is not enough space where it is being proposed and the fact that adding another junction for traffic will severely degrade traffic around Woking & Guildford which is bad enough during rush hour already. Adding many more houses and as well as that many more cars into a congested system will make things far worse. This is a terrible idea when the traffic is already crippled enough as it is. The A3 gets incredibly congested now due to all the people commuting to London and Guildford and this will exacerbate things massively.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/33</th>
<th>Respondent: 15067361 / Nicola Adams</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer:</td>
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The evidence base identifies a wide uncertainty range in future housing demand, which may not require the volume of development outlined in the LP. This range has not been acknowledged in the proposed submission LP, which may result in excessive development and non-essential loss of rural sites.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/36</th>
<th>Respondent: 15067393 / Anthony Fairbairn</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer:</td>
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</table>

I object to this plan.

GBC have not followed the correct process in that the plans have been changed and a new junction to the A3 added which will cause major flow problems in Send and which is already gridlocked every rush hour and cannot handle any increase.
Have the council considered the knock on effect on local services like GP, schools and hospital?

The industrial site at Send is not needed and should be on BROWN FIELD site at Slyfield.

GBC's Transport Assessment was not available to councillors when the vote was taken on 24th June.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/35</th>
<th>15067425 / Anita Fairbairn</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td><strong>Answer:</strong></td>
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<td></td>
<td>I object to this plan. Every major site in Send proposed by GBC has been changed and a massive new road junction has been added. The 2014 proposal for 430 houses went down to 185 in April 2015 and has now gone up to 485. These significant changes require another full consultation under Regulation 18</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/767</th>
<th>15076513 / Ian Groden</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td><strong>Answer:</strong></td>
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<td>I object to the figures for new homes, particularly in a post-Brexit world. These now need to be revised downwards. Is the planned number anyway deliverable if infrastructure has not yet been sorted out?</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/46</th>
<th>15081569 / Gary Cable</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td><strong>Answer:</strong></td>
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<td>No I don't agree as I understand the need for homes has been well exaggerated by nearly double the amount mentioned in the SHMA 2015. I object to so many houses being built on green belt land</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/51</th>
<th>15081729 / peter mccarthy</th>
<th>Agent:</th>
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I object because the evidence that has been used to arrive at the proposed changes is based on GBC ELNA carried out in 2013. These have been shown to have been reduced over the last 3 years by up to 80%. In addition, the housing numbers have been exaggerated by including students in the population increase to amplify the number of new houses required. Currently in the Send/Ripley area the current infrastructure finds it difficult to support the current population. If this program goes ahead as currently set out it will result in grid-lock on our roads, the possible collapse of the local health services, schools being even more over crowded than present and the disappearance of both villages as separate entities.

Attached documents:

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I OBJECT on the basis that the GBC has not provided sound evidence of the ELNA 2015 which suggests that industrial space in Burnt Common is no longer required. I further OBJECT as the GBC has not followed the correct planning process in regard to the large scale road junction at Burnt Common. This proposal requires full public consultation under Regulation 18.

Attached documents:

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I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

Attached documents:

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I object

Attached documents:

---

I object

Attached documents:
I object. I do not agree that there is sufficient evidence for the need to build so many additional houses and industrial space in Send and in particular at Burnt Common. The Employment Land Needs Assessment (ELNA) 2015 shows an 80% reduction in employment space required form the ELNA 2013, and therefore the additional industrial space proposed at Burnt Common is not required and there is insufficient evidence to support the need for it. I do not understand why the Council would propose such a new site anyway when Slyfield would be the appropriate site for any further development.

There is insufficient evidence to support the need for the additional housing proposed in Send and the number of foreign students has been wrongly used to inflate the need for additional houses. The proposal also would remove Send from the Green Belt and I OBJECT VERY STRONGLY TO THIS. There is insufficient evidence to clarify how the local infrastructure would cope with such a development.

Attached documents:

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I object to the revised plan for S1,S2,H1,H2,H3,P1,P2,P3,P4,P5,E5 E6, E7,E9,D4I1,P12,P13,P14 - on the basis that A46 was not proposed or considered as a strategic site in the first consultation - it was safeguarded and was not removed from the GreenBelt. No exceptional circumstances have been demonstrated or approved. It also fails the National Planning Policy Framework - it is a Builder Led building proposal not local Parish Council/residents. We don't need a secondary school, many in the area are currently under-subscribed! - just one example of why it fails NPPF. There has been NO meaningful engagement with local residents.

There is inconsistency on how you are measuring Sustainability versus Sensitivity - Normandy and Flexford are two separate villages, on one hand you treat them on one = Sustainability. On the other, Sensitivity, you treat them as two separate. I object to this approach, it is illogical and unfair.

I object to the claim that A46 will lead to improving services for local residents. this is not fact, all shops and pubs in the village have closed over the years due to lack of trade - NO ONE IN THE VILLAGE USED THEM!

I object to the treat to the Thames Basin Heath Special Protection Area -A46 is only 800 metres away from the TBHSPA so it is within the 400m zone of Protection

There is a risk of flood, no consideration is being to your own Surface Water Management Plan which excluded land north of A46 because of Flood Risk.

I object to the disproportionate scale of the proposed building works in Normandy, it is completely unjustified and will destroy our rural environment. The road network cannot cope today, long delays on the A31 and A3 trying to get into Guildford or onto the major road networks to get to work. Also the detrimental health issues caused by massive development, plus the noise pollution and the continual noise and traffic chaos with Lorries and Construction materials and vehicles

I object to the basis of the plan which is distorted by large student numbers from Guildford University, which disproportionately increases the 'required' number of houses. the University must provide campus housing for the...
students, not destroy greenbelt land by trying to accommodate students off campus. The SHMA is not justified and should be reviewed.

GBCs local plan is unsustainable and is against the wishes of most local residents. There are many BrownField Sites in the Guildford area that would benefit from development of some type - there is no reason to destroy greenbelt land and affect areas of beauty and nature

Attached documents:

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Comment ID: SQLP16/605  Respondent: 15098945 / ALISON TURNER  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

The evidence is not factual, hence it is not based on lawful or honest grounds

Attached documents:

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Comment ID: SQLP16/110  Respondent: 15104929 / Lauren Stafford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I object to the new housing estate near burnt common. The traffic through Send and Ripley is dreadful already and more houses with an average of 2 cars per household will make this worse. We will see an increase in pollution in the village, not great when there is a school on the main road in Send.

Attached documents:

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Comment ID: SQLP16/114  Respondent: 15106689 / Joseph Hine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

1. 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?

Attached documents:

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Comment ID: SQLP16/117  Respondent: 15108065 / Claire Cable  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/118</th>
<th>Respondent: 15108065 / Claire Cable</th>
<th>Agent:</th>
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<tbody>
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<td>Answer: (Yes)</td>
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I object

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<tr>
<th>Comment ID: SQLP16/123</th>
<th>Respondent: 15108161 / Garry Lochhead</th>
<th>Agent:</th>
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<td>Answer: (Yes)</td>
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I object on the basis that the evidence for the number of new homes required to satisfy the plan is excessive to support the estimated population growth of 20,000.

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<tr>
<th>Comment ID: SQLP16/131</th>
<th>Respondent: 15110177 / GORDON TURNER</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer: (No)</td>
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No I object to the Up to date part as there has been no real consultation

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<tr>
<th>Comment ID: SQLP16/134</th>
<th>Respondent: 15110721 / Stuart Reeves</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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<td>Answer: (Yes)</td>
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I object because the number of required houses has been exaggerated. 50% of the new homes could be built on brown field sites and the infrastructure overload has received very little analysis

Attached documents:

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<tr>
<th>Comment ID: SQLP16/152</th>
<th>Respondent: 15120481 / Jonathan Barratt</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Comment ID: SQLP16/16</td>
<td>Respondent: 15124705 / Hart Builders (David Hart)</td>
<td>Agent: Hart Builders (David Hart)</td>
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<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td><strong>Answer</strong>: (No)</td>
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<tr>
<td>I object, the green belt should not be built on.</td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/162</th>
<th>Respondent: 15130625 / Joan Alldis</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td><strong>Answer</strong>: (Yes)</td>
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<tr>
<td>I object to the Proposed Submission Local Plan Strategy and Sites because GBC has changed every major site in Send proposed for development. The 2014 proposal for 430 houses was reduced in April 2016 to 185 and has just increased to 485. This is a significant change and consequently requires anothe full consultation under Regulation 18 as opposed to the 'short cut' under Regulation 19. By utilising Regulation 19 GBC is invalidating the entire process.</td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/172</th>
<th>Respondent: 15135873 / Julie Andrews</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td><strong>Answer</strong>: (No)</td>
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<tr>
<td>I object because infrastructure overload has not been taken into account in detail.</td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/187</th>
<th>Respondent: 15140289 / Francis Pearse</th>
<th>Agent:</th>
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<tr>
<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td><strong>Answer</strong>: (Yes)</td>
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</table>
I object. The proposed development on A44 Send Hill will have a major negative impact on the surrounding areas, the roads are not suitable to handle the additional traffic and the numbers of vehicles that will be generated by both the additional housing but particularly the travellers sites which will attract a higher proportion of caravan, trades vehicles and [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Attached documents:

Comment ID: SQLP16/188  Respondent: 15140289 / Francis Pearse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object, the developments that are proposed for A44 will have a significant negative impact on the surrounding areas and in particular the road network in the area. The additional housing and in particular the travellers sites will generate significant additional traffic and parking based on the fact that most private homes now have between 1 and 3 cars / vans and the travellers sites also have a high concentration of caravans, trades vehicles and other trade related paraphernalia that is both unsightly and a danger to the environment.

Attached documents:

Comment ID: SQLP16/1366  Respondent: 15140705 / Simon Moxon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

The consultation document is nearly 2000 pages and is not designed for the layman to read and understand, probably deliberately.

Attached documents:

Comment ID: SQLP16/224  Respondent: 15146017 / Liam Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I object because there is not enough evidence for this submission to go ahead.

Attached documents:

Comment ID: SQLP16/232  Respondent: 15146049 / Ian Tulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)
I object because Green Belt land does not need to be built over. Half of the new homes could be built on brownfield sites.

Attached documents:

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<tr>
<th>Comment ID: SQLP16/257</th>
<th>Respondent: 15156609 / stewart Gibbons</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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I would like to object to planned building of 700 homes per year, the area of Send does not have sufficient infrastructure to support this type of expansion. There are insufficient schools, road and transport system. Will destroy the village and its uniqueness, turn the whole area into a massive Conurbation.

The process which this has been proposed contravenes not only planning commitment and guidance as laid down by the government for green belt, but also has ignored due process.

I object to further development for the following reasons. With advent of the UK exit from the EU, the prediction for the requirement for housing and development of commercial units will need to be revised downwards. As the 3 million EU citizens currently in the UK, will be affected by this current event, and their ability to stay in this country will also be affected. So your estimates for further development of housing are wildly exaggerated and need to be revised downwards.

In addition to the potential down grade in the economy due to Brexit, your estimation for commercial and housing development is wildly exaggerated and unnecessary. Given you have allowed development of Send Marina; I really don’t understand how you can commit to further commercial developments. So therefore this development is folly this area does not need.

In particular, I want to object to all the following points:

I object to Garlicks Arch development of green belt land which contravenes government guidelines and that due process was not followed in the introduction of this development into this plan, and did not follow this process. Its inclusion in this plan was included at the last stage and did not follow process. So for that reason should be excluded.

I object to the council changing the enclosure of green belt land round the Ripley and Send villages, changing of village boundaries to allow for future development.

I object to the wholesale destruction of green belt land in this area (including development of 2000 homes at Gosden hill farm, Merrow, and also Send and Ripley), which contravenes directly the government stated commitment to preservation of green belt land.

I object to the creation of new north and South Bounds slips ways from the A3 to the A247clandon Road (policy A243) at Burnt common, as in light of the wholly unnecessary due to planned expansion which unlikely be needed within the 10 years.

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/262</th>
<th>Respondent: 15156673 / Emma France</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer: (No)</td>
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</table>
I object. I think that important information has been excluded.

Attached documents:

Comment ID: SQLP16/267  Respondent: 15156673 / Emma France  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: (No)

Guildford Borough Council have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by Guildford Borough Council in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50% of new homes needed could be built on brownfield sites. GBC's Transport Assessment was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention.

Attached documents:

Comment ID: SQLP16/1957  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: (No)

? The Green Belt and Countryside Study;
? Infrastructure Deliver Plan

Attached documents:

Comment ID: SQLP16/271  Respondent: 15163297 / Barbara Collins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

I have read through the Guildford plans and although you state that in all cases you have taken infrastructure into account I cannot see how justification can be made for:

1) the amount of proposed housing in Walnut Tree Close adding to the already congested and narrow road. I do not believe that all of the proposed new residents will rely solely on public transport (although this would be an ideal scenario), as in general most adults own a car. Walnut Tree Close is already an extremely difficult road to traverse and is highly used due to access for the railway station, the Post Office and Businesses based there. The question is: How do you propose to improve the infrastructure and access to the amenities in Walnut Tree Close with the additional housing?

2) I could not see any mention of additional schools for the proposed new residents. Surely this is an oversight?
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/315</th>
<th>Respondent: 15177505 / Iain Guest</th>
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I do not believe the evidence base is appropriate and I do not agree with the interpretation of the statistics. I do not agree it justifies any encroachment/development of the green belt.

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/314</th>
<th>Respondent: 15177537 / Elizabeth Guest</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
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My concerns relate to the scale of housing proposed and the percentage of which will be in Green Belt. Although Guildford Borough Council have stated they will protect Green Belt they then go on to contradict this whereby stating in the appendix (policy p2) that 65% of the proposed housing will be in the Green Belt. This will lead to ribbon development and our beautiful and historic villages and rural areas will be destroyed. In addition to this I do not see how the infrastructure of our villages can support such development and Guildford Borough Council have provided little comfort on how they will improve rail and road infrastructure in addition to providing other services to support such mass development.

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/321</th>
<th>Respondent: 15182913 / Nicola Spurgeon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
</tr>
<tr>
<td>Answer:</td>
<td>(No)</td>
<td></td>
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</tbody>
</table>

No. I object as GBC have not followed due process as increasing the number of homes to 485, from 185 in Apr 16 requires full consultation under Rule 18, not the shortcut GBC have taken under Regulation 19.

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1197</th>
<th>Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
</tr>
<tr>
<td>Answer:</td>
<td>(No)</td>
<td></td>
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</tbody>
</table>

Attached documents:
The strategy put forward in respect of housing delivery and the Green Belt is inadequate. Please refer to letter dated 8th July 2016 for further detail.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/489</th>
<th>Respondent: 15216129 / Timothy Hewlett</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document:</td>
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<td></td>
</tr>
<tr>
<td>Answer:</td>
<td>(Yes)</td>
<td></td>
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</tbody>
</table>

The proposed submission local plan strategy and sites is wholly inadequate and has a menace to the well being of the people who live in those areas where these unwanted developments are proposed.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/304</th>
<th>Respondent: 15231489 / Alan Road</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
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<tr>
<td>Answer:</td>
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</tbody>
</table>

I object to the newly revised Draft Local Plan. It makes sweeping changes to previous drafts and I further object that the consultation period of just six weeks to deal with this complex document of some 1,800 pages.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/309</th>
<th>Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
</tr>
<tr>
<td>Answer:</td>
<td>(Yes)</td>
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</tr>
</tbody>
</table>

The hospital supports the local plan and the various proposed developments on housing and transport infrastructure.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/336</th>
<th>Respondent: 15236833 / Uwe Frohmader</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
</tr>
<tr>
<td>Answer:</td>
<td>(No)</td>
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</tr>
</tbody>
</table>

I do not agree with this plan

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
<th>Document</th>
<th>Answer</th>
<th>Attached documents</th>
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<tbody>
<tr>
<td>SQLP16/341</td>
<td>15238881 / Stephen John Tully</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>()</td>
<td>I object to GBC failure to include the Town Centre Masterplan 2015 within the plan.</td>
</tr>
<tr>
<td>SQLP16/351</td>
<td>15241313 / Christine Relf</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>(Yes)</td>
<td>I object to the building of 400 houses and 7000 sq meters of industrial space at Garlick Arch opposite Send Marsh Road.</td>
</tr>
<tr>
<td>SQLP16/357</td>
<td>15241345 / Peter Relf</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>I object to building 400 houses and 7000 sq metres of industrial space at Garlick Arch.</td>
</tr>
<tr>
<td>SQLP16/366</td>
<td>15241729 / Mark Brackley</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>I do not agree</td>
</tr>
<tr>
<td>SQLP16/371</td>
<td>15241953 / J Parkes</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>(No)</td>
<td></td>
</tr>
</tbody>
</table>
The evidence is based on skewed data which is inward facing and does not reflect ALL needs of the EXISTING community. We do not need to bring hundreds of new people from different countries [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/538</th>
<th>Respondent: 15244097 / Persimmon Homes (Craig Hatton)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: (No)</td>
<td></td>
</tr>
</tbody>
</table>

Guildford BC planning context & housing numbers

Guildford BC is currently in the process of producing a new Local Plan which is to cover the period 2013 – 2033 and guide development within the borough and is to be compliant with the National Planning Policy Framework (NPPF). This representation is in response to the Regulation 19 consultation phase for the pre-submission version of the draft Local Plan. Persimmon Homes are pleased to have been given the opportunity to make representations on this concerning the Site and general planning matters within the Borough. Persimmon are also pleased that Guildford BC has acknowledged the significant challenges that the borough faces in delivering sufficient housing to meet its needs. The previous interim housing figure of 322 dwellings per annum agreed on May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. The reliance on this figure has meant that Guildford BC has significant under-delivered on their housing requirements over the past five years as shown in the below table:

<table>
<thead>
<tr>
<th>Year</th>
<th>Net Completions</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/11</td>
<td>190</td>
</tr>
<tr>
<td>11/12</td>
<td>262</td>
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<tr>
<td>12/13</td>
<td>234</td>
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<tr>
<td>13/14</td>
<td>137</td>
</tr>
<tr>
<td>14/15</td>
<td>242</td>
</tr>
</tbody>
</table>

As the housing completions above show, Guildford has not only been under-delivering against the now up-to-date Objectively Assessed Need (OAN) but there has also been consistent under-delivery against the interim housing target, which also needs to be factored into an emerging housing target moving forward.

The most recently produced Annual Monitoring Report (AMR), published in October 2015 for the period 2014/2015 showed that net completions of dwellings in the borough for this period was 242 and that the majority of homes completed in this period are on sites of under 20 homes. As the AMR notes “the number of new homes completed this year (2014/15) is still lower than required to meet our objectively assessed need…contributes to a growing deficit of new homes”. The recommendation within the AMR following this states that “housing provision is currently restricted by the lack of available and deliverable development land in the borough….delivery rate is only likely to increase when larger areas of land are suitable and available for development”. This shows the necessity for suitable and available sites to be considered and this should apply to all sites within the borough that meet this criteria. Persimmon Homes have control of the Site through an option agreement with the landowners and the Site is available for development. The council also consider the site to be suitable for development, having identified it within the proposed submission Local Plan.

i. Objectively Assessed Need
Guildford Borough has an identified (OAN) of 693 dwellings per annum following the conclusions of the West Surrey Strategic Housing Market Assessment (SHMA) produced in September 2015 by GL Hearn. This assessment was carried out as part of the Housing Market Area (HMA) known as West Surrey which included Waverley and Woking in addition to Guildford. Persimmon have concerns that the SHMA may have under-estimated the OAN for Guildford due to migration from London into the borough expected to increase and by downplaying the need for jobs. The most recent population projections produced by Office of National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000 and this increase is anticipated to be faster than previously considered based on 2012 population figures, which have informed the SHMA which in turn has informed the housing requirement for the new Local Plan. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity to London, strong rail connections and reputation as being part of the commuter belt and a desirable place to live. It is on this basis that Persimmon believe that the OAN to be inaccurate and should be revised upwards taking into account the increases based on the 2014 projections as opposed to the 2012 figures. This should, in turn, mean that the housing requirements in the new Local Plan should also be revised upwards, taking into account the updated projections; the constant under delivery in recent years and the need to better allow for flexibility within the plan for economic growth reasons etc.

This point is further supported by the established planning principle of seeking to plan for balanced growth in jobs and homes where possible with a view to reducing the need to travel and commuting distances. The SHMA identifies that to support the forecast growth in employment a high level of growth is needed.

ii. Five-year supply of deliverable housing land

Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%...where there has been a record of persistent under-delivery of housing, LPAs should increase the buffer to 20%”. It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.5 years supply whilst at worst this drops to 1.4 years. It is also clear that Guildford has persistently and consistently under delivered and therefore those sites, which are capable of coming forward sooner should do, without being fettered by ill conceived policy requirements.

ii. Housing requirements within new Local Plan (2013-2033)

The pre-submission version of the draft Local Plan makes provision for the delivery of 13,860 new homes over the plan period (2013-2033). This equates to 693 dwellings per annum which matches the identified housing need through the SHMA. The draft Local Plan states that “the delivery of new homes is expected to increase over the plan period, reflective of timescales associated with delivery of strategic sites”. The draft Local Plan sets out the housing delivery in different tranches as below:

Annual Housing Targets (as set out in the draft Local Plan – Policy S2)

The above shows that there is proposed to be an increasing level of delivery over time as the plan progresses through the plan period. On this basis, to ensure the minimum housing requirements are achieved, over the first five years of the plan an average of 693 dwellings per annum are to be delivered. This raises an immediate concern given that GBC cannot demonstrate a five year land supply of any better than 2.5 years. As the net completions table also shows, the first two years of the plan period 2013/14 and 2014/15 have delivered significantly fewer than 693 dwellings per annum. We are concerned that insufficient sites have been identified to deliver this housing provision and concerns particularly over the deliverability of Wisley Airfield. Should the airfield be unable to deliver the allocated 2068 dwellings as proposed, then this number will have to be subsumed in other areas and given the local opposition to this scheme and impact on the highway network the deliverability of Wisley Airfield must be strongly questioned.

It is therefore clear that the evidence used for the Proposed Submission Local Plan Strategy from a housing perspective is not adequate or up to date.

Does the SHMA use the latest housing projections?
In addition, for those reasons above, whilst we recognise that the council has made some difficult decisions concerning some of the large strategic allocations, these are by their very definition slow to deliver units and it is clear that the council are not planning to deliver any meaningful increase in supply in the short term and for these reasons, those sites which are capable of delivering units quickly within the first five years of the plan should be considered favorably; this includes land to the east of Foreman Road, Ash.

With regards to more specific comments, Persimmon Homes are pleased that both policies A29 and A30 identify the site for development, however, we do not believe for those reasons below, that the identification of a road through part of the site is appropriate; feasible or indeed the correct approach. For the reasons set out below it is therefore clear that the evidence used for the Proposed Submission Local Plan Strategy and Sites is not adequate, up-to-date or indeed relevant.

The following comments should be read alongside the Odyssey Markides Technical Note dated July 2016, which accompanies these representations. We have drawn some of the comments within the Technical Note out, but expansions of these points are made within the note.

Two land allocation policies of note in the draft LP are Policy A29 and Policy A30. Policy A29 is a land allocation for up to 1,200 dwellings on land adjacent to that in control of PHTV, between Foreman Road and Harper’s Road, as well as other small areas to the west. Policy A30 allocates land which is, in part, under the control of PHTV for provision of a new railway over bridge for vehicles and pedestrians. This new bridge will facilitate the closure of the existing level crossing on the A323 Guildford Road allowing unrestricted movement along the A323 and safer crossing for pedestrians; refer to Drawing A/GB/ASHSTATION.1/04 (Mayer Brown, November 2015).

Having reviewed the proposed railway over bridge it is apparent that it has been designed with some relaxation in Design Manual for Roads and Bridges (DMRB) standards applied, in order to allow the bridge to closely align to the existing route of the A323. A 30mph design speed has been used, with 90m forward visibility provided.

Based on this data it is considered that although implementing a new bridge over the railway line would be effective in reducing delay to the local highway network, it is not necessary in highway capacity terms as the operation of the level crossing would still be within capacity even after the LP developments are implemented.

The new bridge is set out in the Guildford Borough Transport Strategy 2016 as Local Road Network (LRN) Scheme LRN21 ‘New road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station’. Its status is ‘Anticipated’ and its estimated cost is ‘£15m’, with delivery between 2017 and 2026.

Those schemes categorised as anticipated are ‘subject to a positive business case, funding can be secured, and planning and statutory approvals are likely to be achieved’.

The GBC Infrastructure Schedule, contained in Appendix C of the draft LP, states that the likely cost is £15m and the likely funding sources will be developer contributions, Local Growth Fund and from Network Rail. This document sets the delivery timescale as between 2018 and 2022.

It is reasonable for some material funding to come from developers of ‘Land to the South and East of Ash and Tongham’ for 1,200 residential dwellings, as set out in Policy A29.

It is however understood from the Enterprise M3 Local Enterprise Partnership (LEP) that there has been no submission made to the LEP for funding. The latest Expression of Interest (EoI) for the Enterprise M3 Local Growth Fund closed on 31 March 2016. This EoI allows for funding requests for schemes up to the year 2020/21. As the new railway bridge is stated as being delivered before 2026 it is therefore concluded that either (1) the bridge would be funded by developer contributions and Network Rail only or (2) that LEP funding will be requested in future and the delivery of the bridge would occur towards the end of the suggested delivery timescales (i.e. 2026).

It is not clear how much funding Network Rail would be providing for this new bridge. Network Rail would likely have to also fund a new pedestrian/cycle footbridge with lifts in order to maintain, or improve, the current level of accessibility for local residents. Relying on pedestrians and cyclists using the new bridge would be contrary to this given
the material greater distance to cross the railway line and the steepness of the proposed crossing. The cost of the footbridge with lifts could be c.£1.5M.

It is therefore unclear why GBC would classify this new bridge as ‘anticipated’ rather than ‘aspirational’. Aspirational schemes are classified as ‘a strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and / or there are significant planning and statutory approvals to be achieved’.

No details are publically available with respect to the vertical alignment of the new bridge; however, it appears that the northbound forward visibility over the bridge would be materially compromised.

This is due to the gradient of the road between Foreman Road and the crest of the bridge, which would likely materially reduce the forward visibility in the vertical plane.

The forward visibility would also be impinged by the actual bridge structure. The bridge would need material safety structures and barriers along the edge of the parapets and embankments for both pedestrian and driver safety. As these would be a solid structure of over 600mm in height it would therefore compromise forward visibility, especially in the northbound direction.

Although it is understood that the location of the bridge was chosen to align as closely to the existing alignment of the A323 as possible, this alignment is not considered feasible.

It is also clear that no discussions have taken place between the parties over the delivery of the wider scheme and there is no common agreement over delivery, timings and funding etc and therefore piecemeal development will continue to come forward in the short term, further impacting upon the aspirational road scheme to come forward.

For those reasons listed above we therefore are of the view that the plan is unsound, because it is not justified, effective or indeed consistent with national policy.


Comment ID: SQLP16/546  Respondent: 15244097 / Persimmon Homes (Craig Hatton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

See earlier comments

Attached documents:

Comment ID: SQLP16/387  Respondent: 15257697 / Deborah allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

The evidence for additional housing in this area has not been proven:
the gathering of numbers was mostly due to the expansion of Guildford University and that is not the normal birth and death situation so I do not believe the numbers accurately reflect

Attached documents:

Comment ID: SQLP16/475  Respondent: 15263425 / Rosemary Napp  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: (No)

the assessment of housing need expressed in the SHMA produced by GL Hearn, is flawed, making no allowance for the transient population of higher education students, and by a number of other issues. It is essential that these issues are addressed and rectified with numbers reducing from circa 700 per year to circa 500 per year.

Attached documents:

Comment ID: pslp17q/153  Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP  Agent: Pegasus Group (Mike Spurgeon)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Answer: ()

The updates to the Proposed Submission Local Plan: Strategy and Sites reflects a more up-to-date evidence base which in some areas differs from the position set out in the previous iteration of the plan published in June 2016.

The use of a more up-to-date evidence base in itself represents a positive development. Revisiting aspects of the Land Availability Assessment and publication of a 2017 Addendum adds weight and legitimacy to the revised capacity assessments of a number of potential development sites. This additional clarity is welcomed.

The Sustainability Appraisal does not appear to have been updated to reflect some site-specific matters which were highlighted in previous representations.


Comment ID: pslp17q/156  Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP  Agent: Pegasus Group (Mike Spurgeon)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Answer: ()

Sustainability Appraisal

The Sustainability Appraisal assesses Site A42 and other proposed allocations against a range of criteria which provide an indication of how well it performs as a sustainable location for new housing. An extract of the scoring system and the
The assessment of Site A42 are enclosed in Appendix A and Appendix B. The site generally scores highly against the relevant criteria in this assessment. However, it is clear that some of the values which have been assigned to this are more negative than would otherwise have been the case.

The following assessment criteria have been used to assess site A42, however, when reviewing these, this particular site has been incorrectly assessed against these criteria and as such it has been assigned an unduly negative value. It is requested that these are reviewed and amended on the following basis:

- **Primary School Walking Distance:** – The SA records a ‘red’ value (where there would be a walking distance of 2km or more between the site and the nearest primary school), when in fact the 800m walking distance (as measured by Google Maps – see extract at Appendix C), would move this into a ‘light green’ category.
- **Previously Developed Land:** - The site is currently afforded a ‘red’ value in category 18, as it has not been categorised as previously developed land. However, based on the definition of previously developed land provided in the NPPF, and following pre-application discussions with the local planning authority in 2016, it is clear that this does represent previously developed land. This matter was previously highlighted in representations submitted in July 2016.

The correction of these inaccuracies in the Sustainability Assessment would result in a stronger performance against the criteria and would better reflect how the site performs against these assessment criteria. This would further reinforce the position that this is a highly sustainable location for new housing on the basis of the selected indicators.

Please see attached for context of representations in their full context and the attachments referred to above.

**Attached documents:** [LON.0500-Guildford-Local-Plan-Strategy-and-Sites-July-2017.pdf](#) (930 KB)

---

**Comment ID:** SQLP16/554  **Referent:** 15266785 / Trenfold Property Limited and Countryside Properties Limited  
**Agent:** Boyer (Michelle Thomson)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

Please see report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited for further details.

**Green Belt Assessment**

First, the GBCS considers that a land parcel either contributes or not to a specific Green Belt purpose (i.e. with the parcel scoring either 1 or 0) without providing any quantification or the degree of that contribution (for example the extent to which a land parcel may make towards a particular Green Belt purpose).

1.13 Second, as a result of this first limitation, the methodology of the GBCS does not allow for any detailed form of ranking to assess the relative contribution each land parcel makes towards the purposes of including land within the Green Belt. The GBCS did not therefore carry out any form of comparative assessment between the identified PDAs/MDPAs.

1.14 Notwithstanding this, the GBCS does identify a number of small PDAs that are considered not to significantly compromise the land parcel score as a whole. These have included sites that have subsequently been proposed as site allocations or safeguarded sites within the previous draft Local Plan (2014) (site references 74-76). Our client’s site was previously identified as safeguarded land (site reference 120).

1.15 Boyer has adopted a scoring methodology to address these issues and quantify the contribution made by each PDA/MPDA towards the purposes of including land within the Green Belt. The aim is to build upon the methodology of the GBCS by enabling a comparison between potential sites already identified through the Local Plan process.
1.16 This approach, together with the sustainability methodology adopted within the GBCS, has been applied to the 11 PDAs/MPDAs surrounding Send, Send Marsh & Burntcommon and Ripley.

1.17 This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt. When compared with the PDAs/MPDAs assessed, it is ranked joint top (i.e. contributes least to the Green Belt) along with land south of Burntcommon. It is considered therefore that its release from the Green Belt would not have any adverse impact on the purpose and function of the Green Belt in this part of the Borough and as such there are no overriding constraints to prevent early delivery of the site.

Previously Developed Land
1.18 The broad approach to removing major previously developed sites from the Green Belt accords with national planning policy and is supported. However, the evidence base to support Guildford’s assumptions about the sites considered to be previously developed appears to be somewhat lacking. There are no details as to the methodology or reasoned justification that has been applied to demonstrate that a site should be considered as previously developed land.

Settlement boundary of villages
1.22 The approach of the Council to respond to the changes in national policy in respect of the Green Belt designation and to protect these areas using development management policies in accordance with the NPPF are supported.

1.23 The addition of ‘Policy D4: Development in urban areas and inset villages’ in the latest draft of the Local Plan which seeks to “promote the efficient use of land” whilst ensuring that “this does not negatively impact upon the quality of the local environment” is also supported.

1.24 Land at Polesden Lane and Send Marsh Road, Send Marsh is bordered on three sides by established housing and defensible boundaries including a footpath to the west (footpath number 46) and a second footpath to the north of the site (footpath number 45). It therefore lies within the effective framework of Send Marsh Village although it does not fall within the proposed settlement boundary as defined by the draft Local Plan.

1.25 Given the evidence presented in previous sections relating specifically to our client’s site at Polesden Lane, Send Marsh with regards to its contribution to the Green Belt and its previously developed land status, the location of the settlement boundary should be redrawn around the entire site.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/418</th>
<th>Respondent: 15267521 / Land Owner of Hornhatch Farm</th>
<th>Agent: Scott Brownrigg Planning (Natalie Walter)</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: ()</td>
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<td>Attached documents:</td>
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<th>Comment ID: SQLP16/429</th>
<th>Respondent: 15269505 / James Adkins</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: (No)</td>
<td></td>
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</tbody>
</table>
I believe the West Surrey Housing SHMA used by Guildford Borough Council as a fundamental rationale for the removal of Green Belt status from Normandy, Flexford and various other local areas now proposed for development was significantly overestimated and has not been subjected to sufficient rigorous checks about its accuracy.

In addition events have now moved on and the current consensus of independent economic forecasters is that the short to medium term UK's (and hence South East's) growth forecast has significantly reduced from previous forecasts due to the likely impacts of Brexit uncertainties on the economy. These reductions of likely growth trends as well as probable changes to population movements have not been factored into the local planning process yet and both these factors are likely to reduce some of the demand for additional new housing.

Attached documents:
I object to the SHMA that is presented by Guildford Borough Council. It is in my opinion, unsound and the detail to be able to fully scrutinise this document is not available, to myself. I have no visibility over the model or formula used to calculate the numbers in the SHMA and as such have no confidence in it. The fact that GBC has got the contractual leverage and ability to force GL Hearn and its sub contractor Justin Gardner Consulting to release these, but does not, and that GBC has failed on several accounts to scrutinise the SHMA within the council, makes me believe this document has been written with 'Policy On' inputs whilst this document should have been prepared in a 'Policy off' mode as required by the NPPF. As the SHMA, in my opinion, forms the back bone of the Local Plan by providing an OAN to then hang all other policies from, without having confidence in the SHMA I have no confidence in the OAN and hence the rest of the Local Plan and consider it all to be unsound.

The specific reasons why I find the SHMA unsound can be found in the attached document written by Cllr David Reeve, which I fully endorse.

Attached documents: [Guildford OAN Review.docx](44 KB)
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/487</th>
<th>Respondent: 15274369 / Trevor Deacon</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: (No)</td>
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<td>The assessment of housing needs are unquantified and unexplained</td>
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<th>Agent:</th>
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<td>Despite considerable criticism, the Plan has not changed a great deal and the points that received the most objections have not been addressed.</td>
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<th>Respondent: 15274913 / Simon Osborn</th>
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<td>Answer: (No)</td>
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<td>As a Surrey resident keen to protect the rural character of a dwindling portion of our county, I am dismayed that the council is proposing to support development in so many Green Belt areas and on sites that are wholly inappropriate for large housing developments. The Green Belt and countryside study seems to take as a fait accompli that much of the green belt should be built on without proper consideration of alternatives. In my view, and I attach much of the blame for this not to the council but to unscrupulous developers using dubious tactics in the pursuit of financial gain (such as the use of Caymans Island companies - Wisley airfield) the council has failed properly to consider how brownfield sites could be developed. It has failed to look ahead and realise that many out of town shopping centres will close in coming years as people continue to do more shopping online. It has failed to realise that the rural character of areas like Ripley, Send and Ockham are an asset to the county that will be destroyed by the developments it appears to be prepared to sanction. The council has failed also to take account of its responsibilities to protect wildlife. Surrey has a large proportion of the UK's remaining lowland heathland, 80% of which has already been lost. The council should be working to preserve this, not destroy it. Yet I see little consideration of this in the documents I have seen. This plan does not present a vision of a sustainable future that will preserve the quality of life of Surrey residents.</td>
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<th>Respondent: 15275009 / Compton Parish Council (Fiona Curtis)</th>
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<td>Answer: (No)</td>
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Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

We object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

We disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

We object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure

We object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites,
would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. We are particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

We OBJECT

The strategic highway assessment requires a great deal more work and hence we OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. We believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, we have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. We would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have *An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF*. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.
The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which we believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

Note Annex 3 - Independent traffic report by RGP - attached.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.
The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)

We Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment

We object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

We object
GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

Attached documents:
- Guildford OAN Review D Reeve.pdf (172 KB)
- NMSS SHMA review annex 5.pdf (1.3 MB)
- Green Balance SHMA review annex 6.pdf (469 KB)
- Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)

Comment ID: SQLP16/508  Respondent: 15275041 / Cora Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I object to the local plan!

You have made significant changes to planning that has already been chopped and changed and argued and objected to before. The prosess that I have been informed of regarding all these significant changes require you to arrange another FULL consultation (not sneeking it in at the end of a meeting) under regulation 18 it appears that you are trying to short cut the prosesses, most likely to not allow residents the time to object.

Attached documents:

Comment ID: SQLP16/501  Respondent: 15275073 / Sean Lightfoote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

I object on the basis that I don't believe the ELNA 2015 shows a need for an industrial area any more. I also believe that international student figures have been used to influence the amount of housing needed even though once their courses are complete they will spread out or return to their respective countries.
The evidence is based on assumptions about population growth in the area which are wildly inflated beyond anything seen before and clearly not in line with the new reality which will be live outside the EU.

Assessment based on future needs and ’Brexit’ not taken into account

9. RPC has concluded that, without modification, the Plan cannot be considered “sound” within the meaning of Section 20 of the 2004 Act and paragraph 182 of the NPPF.

12. RPC are not satisfied that the documents have been made available in accordance with Regulation 19. In particular the Transport Document not being available until 6 June 2016. What RPC describe as “constant alterations to the website throughout the consultation period and, in particular the late substitution of Garlick’s Arch for the previous A43 allocation, which was not disclosed until the publication of the PSLP on 6 June 2016.

14. RPC object to the approach taken to the assessment and calculation of the housing requirement in the plan.

15. The PSLP seeks to meet OAN by delivering 693 pa during the plan period, an overall figure of 13,860 in the plan period with delivery of housing numbers increasing from 500 per annum in 2018-19 to 790 p.a. in 2032/33.

16. The justification for this is explained in the Sustainability Appraisal June 2016 at para 6.2.10: (Text not copied)
17. While Guildford Town Centre and urban area takes 2,742 units. This is less than 14% of the total projected housing requirement and much of the remaining 11,000 homes are to be accommodated in urban and village extensions (mainly open countryside around existing settlements) and in rural areas including what are called “inset villages” - effectively a redrawing of Green Belt boundaries to exclude former Green Belt villages and open land surrounding them from the protection of Green Belt designation. Of the 11,000 non-Town Centre requirement over 50% are being planned for the 3 North East Wards of Lovelace, Send and Clandons/Horsleys. This is disproportionate and unacceptable for such a small and sparsely populated area.

18. It is noted that there is a significant shift in the balance of urban to rural housing site allocation at the expense of the Green Belt, when comparing the housing allocations in 2016 in comparison to the 2014 draft Plan. In the 2014 Plan Guildford town centre and urban area was allocated 3439 homes. Total housing potential listed was 14057 but there was a provision of only 13,040 in 2014 policy 2, which means that nearly 25% was allocated originally for town/urban in 2014. However the parameters of site allocations seem to have altered which now masks the true extent of the shift from urban to rural. For example, A24 Slyfield (1000 homes), A25 Gosden Hill Farm (2000 homes) and A26 Blackwell Farm (1800 homes) are now designated as “Guildford urban area” whereas in 2014 these 3 sites were allocated as “land around Guildford urban area”. The 2016 PSLP town centre and urban area (excluding Slyfield, Gosden Hill and Blackwell Farm sites) on a like for like basis give a housing provision of 2108 homes with a total housing figure of 13860 which means only 15% of new homes are allocated in the original definition of the town centre or urban area, against the 25% allocation in 2014.

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19. RPC takes issue with the approach taken to meeting housing need within the Borough as a whole and objects to adopting the whole of the OAN as the housing requirement in a Borough which is almost 90% Green Belt and which contains significant areas of AONB.

20. RPC note that Core Strategies in other constrained areas have been found to be “sound” despite a housing requirement significantly below AON. (see for example Brighton and Hove City Plan 2016).

21. The approach taken by the Council does not appear to have understood or followed the decision of the Court of Appeal and judgement of Lord Justice Keene in City of St Albans v Hunston Properties plc [2013]EWCA Civ 1610 at “There is no doubt, that in proceeding their local plans, local planning authorities are required to ensure that the “full objectively assessed needs” for housing are to be met, “as far as is consistent with the policies set out in this Framework”. Those policies include the protection of Green Belt land. Indeed, a whole section of the Framework, Section 9, is devoted to that topic, a section which begins by saying “The Government attaches great importance to Green Belts”; Paragraph 79. The Framework seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that “the general extent of Green Belts across the country is already established.” It seems clear, and is not in dispute in this appeal, that such a Local Plan could properly fall short of meeting the “full objectively assessed needs” for housing in its area because of the conflict which would otherwise arise with policies on the Green Belt or indeed on other designations hostile to development, such as those on Areas of Outstanding Natural Beauty or National Parks.”

22. Despite this clear guidance from the Court of Appeal, the Council appears to have adopted the full OAN as the basis for the Plan. This in turn, and taken together with the emphasis on providing new housing in the Green Belt has led to removal of protection of the Green Belt from places previously within the Green Belt, by insetting of land in and around settlements to exclude them from the Green Belt and by the allocation of land within the Green Belt in order to allocate it for housing.

23. While RPC has not carried out its own OAN assessment it is noted that Table 1 of the PSLP indicates delivery well excess of the requirement identified in Policy S2 for the period 2018-2033. Paragraph 4.1.12 of the Plan confirms that the
number of new homes shown in Table 1 is greater than the figure in the policy and purports to justify this as building flexibility into the plan and to demonstrate that the strategy is capable of delivering the target. The extent of oversupply in the Plan (130% of OAN) is not a figure derived from national policy and appears to be arbitrarily chosen. National policy in the NPPF states the requirement “to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”. NPPF 82 states: “Once established, Green Belt boundaries should only be altered in exceptional circumstances…” There is no “exceptional” need for flexibility in Guildford Borough and certainly no case is made out to support such a significant over-supply.

24. In all the circumstances, RPC do not accept that either the housing requirement of 693 dwellings per annum or the proposed Table 1 delivery is reasonably justified. The plan has not been drawn up in conformity with the NPPF. The balance between housing need and the exceptional circumstances required to justify Green Belt boundary alterations is not made out.

25. The policies of the Plan are therefore not “sound” in this important respect and both the requirement in Policy S2 and the Planned Delivery between 2018 and 2033 should be modified by significant reductions in the number of dwellings proposed in each case.

Insetting of Green Belt

39. The approach adopted by the GBC in the Local plan is to exclude land in and surrounding rural settlements from the protection of Green Belt designation by “insetting” of land some of which continues to serve the Green Belt purposes and contributes to the openness of the Green Belt.

40. The approach appears to have taken place as a significant general shift in policy, rather than on the basis of an assessment, in each case, of the extent to which the land in question still serves GB functions.

41. The “exceptional circumstances” required to justify amendment of GB boundaries are not identified.

42. The exclusion of these areas is not in accordance with the guidance in the NPPF. Unless this policy is modified the Plan cannot be “sound” and the criteria in Section 20 of the 2004 Act are not met.

43. RPC objects to the proposed insetting of rural villages so as to exclude them from the Green Belt protection.

44. There are no exceptional circumstances which justify such an approach and it does not follow or accord with the guidance in the NPPF set out above.

45. This Report is particularly concerned at the following insetting: (1) the insetting of Ripley Village; (2) the Send Marsh/ Burnt Common insetting.

46. There is no change of circumstances or exceptional circumstances which justify the insetting.

47. While RPC objects to the general approach to insetting in principle, it also objects to alignment of the boundary of the insetting, which has been drawn too widely and without proper or any regard to the character of the land to be excluded from the Green Belt or the extent to which it continues to fulfil Green Belt purposes.
48. RPC objects in particular to the insetting of land to the rear of the Talbot and the allocation A45. (above) The land to the rear of the built development behind the Talbot beyond the light industrial buildings is open land and forms a valued part of the rural setting of the village.

49. RPC takes the view that the insetting of Ripley Village has been far too widely drawn. The NPPF para 86 states: “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

50. Whilst acknowledging that much of the Village of Ripley is in a widely drawn conservation area RPC consider that the open character of the village does make an important contribution to the openness of the Green Belt which justifies retention of its existing Green Belt status.

51. Accordingly RPC objects to the insetting of Ripley from the Green Belt, both in principle and in detail. The Plan is not “sound” in this respect and RPC recommends that the Plan should be modified to retain the village entirely in the Green Belt. If this objection is rejected, and the village is to be inset, the boundary should be drawn more tightly into the existing village built envelope and the paddock are to the rear of The Talbot excluded.

Attached documents: Report on Guildford LP Reg 19 (V4) FINAL 17.7.16.pdf (489 KB)

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Comment ID: SQLP16/560  Respondent: 15280321 / Sport England (Owen Neal)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.

Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: http://www.sportengland.org/facilities-planning/planning-for-sport/

Evidence Base

The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, para 73 of the NPPF requires that:
“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”

Sport England is aware that the Council does not have an up-to-date Playing Pitch Strategy or indoor or outdoor sports facilities strategy. It is noted that the Council relies on an open space, sport and recreation assessment based on the out-of-date “PPG17 – planning for open space, sport and recreation” and does not include a Playing Pitch Strategy. It is noted that there is little detail on sports provision within the assessment and indoor sports facilities are not included. It is crucial that the Council has an up-to-date and robust evidence base in order to plan for the provision of sport both playing fields and built facilities. Sport England would highly recommend that the Council undertake a playing pitch strategy (PPS) as well as assessing the needs and opportunities for sporting provision. Sport England provides comprehensive guidance on how to undertake both pieces of work.

Playing Pitch Strategy


This guidance document provides a recommended step by step approach to developing and delivering a playing pitch strategy (PPS). It covers both natural and artificial grass pitches. Sport England believes that to ensure there is a good supply of high quality playing pitches and playing fields to meet the sporting needs of local communities, all local authorities should have an up to date PPS. By providing valuable evidence and direction a PPS can be of significant benefit to a wide variety of parties and agendas.

Assessing needs and opportunity for sports provision (Indoor and Outdoor)


This guide complements the PPS guidance providing the recommended approach for assessing the need for pitch provision. Sport England believes that providing the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need will provide a clear understanding of what is required in an area, providing a sound basis on which to develop policy, and make informed decisions for sports development and investment in facilities.

Without this additional evidence base, Sport England is concerned that the Council has not adequately planned for indoor and outdoor sports facilities in accordance with paragraph 73 of the NPPF. On this basis, Sport England does not agree that the evidence used is adequate, up-to-date and relevant.

Attached documents:

Comment ID: SQLP16/561  Respondent: 15280385 / Alexander Chenery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (Yes)

I believe the local plan fails to take any material consideration of (1) the impact on the proposed Guildford Town Centre plan on local residents who live within that zone, (2) the existing infrastructure (specifically, parking) difficulties and problems faced by local residents based on current developments in the Town Centre and surrounding areas, and (3) the significant impact that future developments in and outside of the Town Centre will have on residents in the Guildford Town Centre area, specifically in relation to parking.
In particular, whilst at various points the local plan notes that the increased housing developments will result in a greater demand for the amenities in Guildford Town Centre and that a number of these developments will not be within walking distance of the Town Centre for many, a number of the development sites would directly result in the removal of car parks and parking spaces. This is totally illogical. There is no thought or consideration given to what happens to cars using these existing parking facilities, or the impact that this would have on residents, who already suffer great misery on the weekends having to use congested dual-use parking bays. Although reference is made Guildford's Transport Plan 2016 and that further consideration will be given to any necessary changes, it is naïve and ill-conceived to believe that significant infrastructure plans can, or should, be formulated without also reviewing the local transport plan. This is both in the interests of local residents and local businesses, who quite understandably want visitors to having adequate parking provision to ensure that Guildford remains a principal retail centre.

I also believe that the local plan fails to take any adequate consideration of the wider catchment area that Guildford has - the report and the evidence base is very insular facing and fails to consider the wider catchment area that Guildford has across Surrey and surrounding counties for shopping and other amenities. It fails to consider that this wider catchment means that cars and parking issues will continue to exacerbated by increased infrastructure development and it is totally misplaced to assume that alternative transport links (such as park and ride (which the local plan seems to place great hope on, but this is totally misplaced and it is quite clear this is not a substitute for car parks) or buses (which, again, the local plan seems to put great hope on, but it is quite clearly not a substitute for car parks given the long distance catchment that Guildford has)) will be adequate to support the increased population who will consider Guildford to be their nearest shopping centre.

The absence of any consideration of the impact on Town Centre parking, and in particular the parking arrangements for residents who already have to put up with congested roads, a lacking of dedicated parking spaces for residents and poor parking behaviour by visitors, means that I do not believe that the plan fails to take account of the interests of all of its stakeholders and I think that the local plan is deficient in this respect.

Attached documents:

Comment ID: SQLP16/629  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

We have reviewed the evidence base, and whilst we recognise that a considerable amount of material has been produced, we are concerned at the reliability of some of the evidence and its application. We are particularly concerned that the evidence has been used inconsistently in order to reach different conclusions between the various Plan stages.

Of greatest concern is the departure from the original (2014) Green Belt and Countryside Study (GBCS), which concluded that development adjacent to Fairlands (and our site, H8-C, in particular) was very sustainable and that development could be accommodated without compromising the purposes of the Green Belt. This conclusion ultimately led to the lands to the west of Fairlands being 'safeguarded' for future development.

Most recently, however, a totally different conclusion has been reached following a review of the GBCS (February 2016). This most recent assessment has concluded that:

'No major village expansions were considered appropriate within the surroundings of Chilworth, East Horsley, Fairlands, Pirbright, Ripley, Shalford and Wood Street Village due to a combination of environmental constraints, limited sustainability credentials, and the potential impact on the purposes and openness of the Green Belt within Guildford Borough'.

As a consequence, the safeguarding of the land adjacent to Fairlands has been removed.

Nothing has changed in the period between these two conclusions being reached which leads us to question the both the
appropriateness of the evidence base and the subjective way it has been applied.

Equally, we are surprised by the lack of evidence supporting how the purposes of the Green Belt have been assessed in relation to individual sites through the sensitivity assessment. The Green Belt Purposes Assessment (http://www.guildford.gov.uk/media/16830/Appendix-1-Green-Belt-Purposes-Schedule/pdf/App_1_Green_Belt_Purposes_Schedule.pdf) provides no rationale or detail to support each single sentence that assesses whether a particular location satisfies each of the four Green Belt 'purpose' tests. Overall, it is considered that too much importance is given to such a subjective assessment; resulting in potentially highly sustainable development opportunities being ruled out in some cases and unsustainable locations being allocated for development in relation to others.

Finally, the lack of evidence provided to support certain allocations and policies is particularly concerning. Given the emphasis placed on strategic sites, the lack of evidence (i.e. the lack of any agreed strategy) for the infrastructure improvements required to enable these is concerning. In this regard we are concerned that as Guildford BC relies so heavily on these larger allocations to deliver its Objectively Assessed Need (OAN) any delay will have very serious implications, particularly in the short to medium term, in meeting the five year housing supply.

Attached documents:

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<th>Comment ID: pslp17q/222</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
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As we set out in our earlier representation, we are concerned at the reliability of some of the evidence and its application. Our concerns in this respect are reinforced by GBC's approach to housing numbers, and whether the proposed reduction can be justified from an evidence perspective. In particular, we are far from convinced the country's in-principle decision to leave the European Union (i.e. Brexit) is having a quantifiable impact on employment numbers, with a resulting reduced demand for housing. We believe this assessment to be highly dubious and would question its validity. We are not aware of any other local authorities - including those neighbouring to GBC - who have taken an approach along these lines.

In setting out this concern, we have reviewed the submission recently made by the Home Builders Federation (HBF) to this same consultation, in which they make a number of persuasive points. They note that there is an inherent uncertainty in employment forecasts and "as such the NPPG does not require a mechanistic matching of labour supply and planned housing provision". They go on to express concern that no consideration has been given to the level of job growth elsewhere in the Housing Market Area (HMA), even though Planning Practice Guidance sets out that employment trends and growth in working age population should be considered across such an area. As such, the approach taken by GBC in this regard is not consistent with national policy.

In particular, we are concerned that Guildford's unilateral approach in this regard is likely to be found wanting. At the recent examination hearings for the Waverley Draft Local Plan, the Inspector set out his view that it would be appropriate for Waverley and Guildford to accommodate the unmet need from Woking. In GBC's rush to reduce their housing numbers - and their Guildford-only economic assessment - they appear to have had no regard for the wider HMA, despite originally commissioning the SHMA (with these neighbouring local authorities) that produced the baseline OAN for all three areas. It does appear that Guildford was willing to work across the HMA when required to do so (in order to produce a shared evidence base) but it has now arbitrarily detached itself from this to reshape its own figures in isolation - through the SHMA addendum which has been solely commissioned by GBC. This approach does not stand up to even the most basic scrutiny from a consistency and reliability perspective. Indeed, rather than looking at how they could meet Woking's unmet housing needs, Guildford are looking to do the opposite by reducing their own housing requirement, despite the Inspector on the Waverley Draft Local Plan suggesting that Guildford would need to take account of this.

Attached documents:
**Comment ID:** SQLP16/564  **Respondent:** 15281409 / Andrew Hogarth  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

I have read the draft plan and the supporting documents. I confess that I find myself disappointed to see that the objections to the previous edition of this document have been largely ignored and this report is simply more of the same.

There is no doubt that we need more houses as our children have nowhere to live. There is room for debate as to whether we really need to increase our housing stock by rather more than 1% a year for the foreseeable future but I accept that there is a need for considerably more housing in the Guildford.

The difficulty is how to achieve this objective without destroying the reason why we all like living in the Guildford Area. Adopting a scheme which involves putting large blobs of new housing, apparently scattered at random on a map of the area will not retain the feel and beauty of our Borough. If a proposal to increase housing in each area by 1% a year was agreed with each local area or parish we could achieve our objective of increasing our housing stock without destroying our countryside. For this reason I object very strongly to the draft local plan.

My other objection is the that I see there is a proposal to turn East Clandon into a designated settlement. This has not been discussed. NO reasons are given for this proposal. Until it is discussed and detailed reasons why this proposal is necessary are given the proposal should be rejected.

**Attached documents:**  
- [GBC local plan1.docx](document) (13 KB)
- [GBC local plan.docx](document) (13 KB)

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**Comment ID:** SQLP16/566  **Respondent:** 15281569 / Malcolm Williamson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

The provisions of the Localism Act 2011 have not been complied with in that East Hampshire District Council is not on the list of consultees. East Hampshire is part of the Wey Valley and the transport infrastructure is shared. EHDC provides an important housing location particularly for lower priced housing serving Guildford workers.

The Bordon area is outside the Green Belt South Downs National Park or the AONB. It is scheduled for development and further development can be sustained without damage to high grade environmental protection areas.

if housing from Guildford and Waverley in damaging locations were moved It could provide the logical basis for Guildford and Waverley to secure their protected areas. It would allow better infrastructure at Bordon such as the re-instatement of the Bordon Bentley Farnham Guildford rail link which is still a protected aspiration for Bordon's development. This is a key to its eco-town status. It meets all planning objectives in terms of environment, housing, affordable housing and industry and be able to fund infrastructure particularly transport via rail not even envisaged by either Guildford or Waverley's proposals.

**Attached documents:**
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<th>Comment ID: SQLP16/565</th>
<th><strong>Respondent:</strong> 15281825 / Nigel Burke</th>
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The evidence base should be reviewed in the light of Brexit. In particular, most commentators predict slower growth or recession for the next few years at least, and Brexit will presumably result in lower immigration, both of which are key drivers for new housing developments. Also, public finances (national and local) are also likely to come under yet more pressure, constraining supporting infrastructure developments.

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<th>Comment ID: SQLP16/567</th>
<th><strong>Respondent:</strong> 15281857 / Jon Dobinson</th>
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There has been a massive and material shift in the evidence base for this consultation as a result of the recent UK decision to leave the European Union, which is expected to result in significant falls in net migration and thus population, reduction in the need for and use of London office space by predictions of up to 25%, with knock-on effects for both commercial and residential property in London and the South-East, plus reduced demand for property and potentially, falling prices. Though predictions vary widely, the general thrust clearly is that the demand for property over the periods outlined in the plan will be materially lower than projected and therefore the exercise needs to be reviewed and amended to reflect these significantly changed circumstances.

**Attached documents:**

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<th>Comment ID: SQLP16/583</th>
<th><strong>Respondent:</strong> 15282241 / Elena Papazoglou</th>
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I object to any building on land that was specifically designated for GreenBelt.

**Attached documents:**

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<th>Comment ID: SQLP16/609</th>
<th><strong>Respondent:</strong> 15282593 / Anne Young</th>
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In my opinion much is out of date or flawed. Perhaps the council would like to share the evidence for the figures of the SHMA for instance?

**Attached documents:**
The house building target of 13,860 dwellings over period 2013 to 2030 must clearly be reviewed following the Referendum result.

Attached documents:

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Continuing to add residents to a borough or an area such as Guildford because of demand will, incrementally, change the nature of Guildford borough and make it less desirable to its residents. The roads and Guildford itself are already crowded, the intended road plans will not alleviate all of the congestion. Congestion will become incrementally worse than increment in traffic and people as adding to queues compounds the problem. Reducing desirability of Guildford cannot be an objective, although it will result from following the draft local plan.

Attached documents:

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I object to the lack of evidence for the alleged housing needs

Attached documents:

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object to the lack of any evidence for the alleged housing need numbers. I think there should more research into what housing and where the housing should be built. The infrastructure and amenities can thought about before any planning to put forward.

Attached documents:

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I object to the lack of evidence for the alleged housing need numbers.

Attached documents:

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Comment ID: SQLP16/647  Respondent: 15297249 / Christine Gates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object to the lack of evidence for the necessity for these huge numbers of houses. Recent houses sold in this area have been bought by Londoners as second homes for investment, not because they need to live here.

Attached documents:

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Comment ID: SQLP16/1646  Respondent: 15299201 / Samira Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.
I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**Infrastructure**

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

**The Highway Assessment**

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which adds to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will
be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that
development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or
traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a
bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight
restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail,
SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide
averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has
been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected
or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this
was not representative, we understand it was removed. That said, the year-on-year data is for different periods and
different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust
approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local
Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed
analysis of the junctions and queuing is required. We question the conclusion that the developments would have
An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of
NPPF’. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond
capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether
findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which
there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning
permissions plus Waverley’s strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the
B3000. The next scenario 2 is the same, but includes GBC’s strategic sites. Given that there is a strategic site in Compton
of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but
considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from
the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a
realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity
of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800
homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area,
1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000
will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows
would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no
solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in
particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought
out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/
business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both
directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of
the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede
emergency vehicles getting to and from the hospital.
The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

**The Land Assessment**

**I object**

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

**Green Belt & Countryside Study**

**I object**

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

**Attached documents:**
I welcome the opportunity to comment on the consultation draft Guildford Local Plan. We have a number of objections to the draft plan.

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

General comments:
We have serious, general objections to the plan which are summarized below as well as being expanded upon in our comments on numbered policies in the draft plan.

• In common with many others we do not believe the housing figure has been properly calculated and we believe it overstates housing need. The Council has prevented Councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

• The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

• We do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.

• Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

• Stronger assurances should be included in the plan that development can only commence when required infrastructure improvements have been secured.

• The A247 through Clandon is overburdened by traffic already and is unsuitable as an A road in any event. In parts it is too narrow for two lorries to pass and lorries routinely mount the pavement at speed in a dangerous fashion. We believe the plan should include proposals to provide other routes for traffic to take traffic away from the A247.

• We object to the Gosden Hill proposal. We do not believe very exceptional circumstances have been shown to justify taking this site out of the Green Belt. Even if the Gosden Hill development were to remain in the plan we believe the boundary should be explicitly drawn so as to prevent it being visible from West Clandon. In addition development should be conditional on the A3 improvements and new railway station.

• We object to the Garlick's Arch proposal. This site was removed from consideration before the previous draft of the plan was issued. We do not understand how this site has been brought back into the plan. We do not believe exceptional circumstances have been shown to justify taking this site out of the Green Belt. The site was not discussed in the Green Belt and Countryside study and there seems to have been no consideration of the justification for removing it from the Green Belt.

Attached documents:
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.
° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
° The current SHMA inflates the proposed housing figure due to
° failure to correct for errors in the historical data for international migration flows,
° issues with the way it considers students and affordability and
° flaws in the method for estimating the number of homes needed to support job growth.
° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable. Why is this so?

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

Attached documents:

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Comment ID: SLPQ16/652  Respondent: 15301409 / Marian Simonds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

6. I OBJECT TO THE LACK OF EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS

Attached documents:

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Comment ID: SLPQ16/654  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/669  Respondent: 15321729 / Fiona Keywood  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  
Answer: ()  
I object to the lack of any evidence for the alleged housing numbers  
Attached documents:

Comment ID: SQLP16/671  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  
Answer: ()  
I object to the lack of any evidence for the alleged housing numbers  
Attached documents:

Comment ID: SQLP16/1315  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents  
Answer: ()  
Local Plan Document & Consultation
The Local Plan marks a defining point for Guildford and its future. The University's involvement with this plan is three fold:

- As civic partner, the University benefits from and contributes to the health and prosperity of the town
- As a major employer the University and its staff are materially affected by the existing housing and infrastructure deficits
- As a land owner the University is planning to develop Blackwell Farm to support housing, infrastructure and employment

The University has submitted a formal and comprehensive response to the consultation through its planning advisors Terence O'Rourke. This letter seeks to reinforce the most material points of that submission. These are:

1. The University is supportive of the Local Plan process and is generally supportive of the draft. A summary of the main comments is attached as an appendix to this letter

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/685</th>
<th>Respondent: 15340929 / Claire Smylie</th>
<th>Agent:</th>
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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough 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. This local plan and the SHMA number have completely ignored these factors.

Attached documents:

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<th>Comment ID: SQLP16/691</th>
<th>Respondent: 15341729 / Debbie Pollard</th>
<th>Agent:</th>
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We strongly object to the 2016 draft Local Plan for many reasons including the loss of green belt in the area. The distinct lack of evidence for the alleged housing need numbers which at 693 a year is more than double the previous figure quoted in 2012 of 322.
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<tr>
<th>Comment ID: SQLP16/697</th>
<th>Respondent: 15342113 / Jane Carwardine</th>
<th>Agent:</th>
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6. Brexit may result in less houses being needed in the future.

Surely with Brexit it is possible that all this housing will no longer be necessary and this plan will just make a lot of money for an already wealthy few.

Please send these points of objection to the independant inspector.

<table>
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<th>Comment ID: SQLP16/699</th>
<th>Respondent: 15342753 / Mike Milne</th>
<th>Agent:</th>
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I object to the lack of any evidence for the alleged housing needs

We have voted to leave the E.U. and so we will be able to control the number of people entering the UK. We need to realistically re-assess our housing needs. I do not believe that we need to build on every piece of land just to appease the current governments wishes.

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<th>Comment ID: SQLP16/700</th>
<th>Respondent: 15342753 / Mike Milne</th>
<th>Agent:</th>
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I object to the lack of evidence for the alleged housing numbers

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<th>Comment ID: SQLP16/720</th>
<th>Respondent: 15348033 / Peter Nicholas</th>
<th>Agent:</th>
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° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

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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 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.

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Attached documents:
Comment ID: SQLP16/731  Respondent: 15349377 / Claire Birch  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

Objections to the Guildford Local Plan 2016.

Comment ID: SQLP16/736  Respondent: 15350465 / Shirley Dicker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

... I OBJECT TO the lack of evidence for the alleged housing need numbers

Comment ID: SQLP16/739  Respondent: 15350785 / Rosemary Dresler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

Lack of evidence for the alleged housing – where are all these new householders going to work? If they are commuting to London why do they need to be housed on green belt land? I have no objection to existing industrial sites and sensible garden developments taking place along with smaller scale developments but 2000 houses will double the size of our village.

Comment ID: SQLP16/746  Respondent: 15352065 / Daniel Sinclair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Answer: ()

The need for housing projected over the next few years is far lower than GBC are supposedly making provision for. What you are proposing in effect is a 35% increase in housing in two small villages which barely have the facilities and infrastructure to cope with the population as it stands. This is unprecedented and far beyond anything proposed elsewhere in the borough. It is completely unreasonable especially since predicted growth in the area is much nearer 15%. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion which underpins all of the housing policies in the Local Plan. GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by...
GBC and well in excess of the official statisticians’ forecasts. Why are GBC pursuing this aggressive house building project when there is no proof of demand?

Attached documents:

Comment ID: SQLP16/751  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

OBJECTION TO THE GUILDFORD LOCAL PLAN (sent by email)

A little over one year ago my wife and I moved to West Horsley from West London with our young son. We moved here away from the hustle and bustle of everyday London life, its density of housing and lack of green open spaces both for us to enjoy and our son to explore. West Horsley is the epitome of what we sought in leaving London: A peaceful, community-spirited, spread out village with local shops with acres of open, pleasant green spaces in and around to enjoy whilst being really well connected to the main roads, railways and airports.

I have tried my best to understand the Guildford Borough Proposed Submission Local Plan: June 2016, but have found it very complex and frankly unwieldy to digest. For your information, the links to Appendices B-E are missing from your website at http://www.guildford.gov.uk/newlocalplan/proposedsubmission

Despite your claims to have ‘listened’ to citizens following the last version of the plan it seems as though very little has changed and, in fact, more development is now being tabled than before. I am writing to OBJECT to the Guildford Borough Proposed Submission Local Plan: June 2016.

Attached documents:

Comment ID: SQLP16/752  Respondent: 15353825 / Terry Madgwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

The new dynamic of consequences of BREXIT surely also impact the overall picture.

· Lack of evidence for alleged housing need numbers – upon what evidence is the figure of 693 a year arrived at, and why is that more than double the previous figure given in 2012 of 322?

Attached documents:

Comment ID: SQLP16/761  Respondent: 15356385 / Mervyn Plumtree  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object to the lack of any evidence for the alleged housing numbers.
Comment ID: SQLP16/763  Respondent: 15356705 / Sandra Madgwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Just how accurate are your SHMA figures and was the person/people responsible for the figures adequately briefed or qualified to declare these? Only 4 years ago, the number of houses needed was put at 322 per year, even then this figure was disputed, however, comments and objections were never addressed and fortunately this was not carried through. So here we are, 4 years on and the figure has soared to around 693 per year in Burpham alone. What justification can you make for this dramatic and frankly terrifying number which will double the size of the village.

Attached documents:

Comment ID: SQLP16/772  Respondent: 15357761 / Ross Haimes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Housing Numbers

I do not agree with how Guildford Borough Council (GBC) have handled the Strategic Housing Market Assessment (SHMA). The SHMA method of calculating housing numbers is not clear and as such the Local Plan should be considered unsound, the number of houses proposed in the plan far exceeds what is required. GBC have simply taken the maximum projected number of houses by the SHMA without using common sense or rational judgement, I understand that other boroughs (e.g. Woking) are applying constraints to their overall housing growth and believe that Guildford should have a similar approach. The SHMA has been demonstrated to overestimate housing numbers in several areas, in particular the amount of new homes required to support job growth and students. Any population growth figures need to be revisited, especially following the vote for Great Britain to leave the European Union which is likely to significantly reduce external migration to the region. The building of houses far in excess of requirement has potential of leading to a property price collapse in the local area which will have long lasting negative economic consequences for all those who currently own homes there.

Attached documents:

Comment ID: SQLP16/776  Respondent: 15358305 / Frances Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.
But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

Attached documents:

Comment ID: SQLP16/783  Respondent: 15359905 / John Burns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

[I attach my objections to this covering email, I have tried to relate them directly to the terms of reference used by Guildford Borough Council; however, I should like to make some fundamental points which I hope the Inspectorate take on board as they point to a flaw, in my opinion, in the Local Plan.

The Plan rests on a market based solution to a housing crisis, one which has suddenly been visited on us, one that we are expected to compliantly accept as being 100% accurate; I do not accept the latter or the former. There is a housing crisis to be sure, it's been building up for decades, successive National Governments, for political reasons, have succeeded in exacerbating it, year on. It is a crisis which is still obfuscated by politicians, mainly due to National Governments ideological bent to markets, thus it remains improperly diagnosed. Are we talking about people not being forced out of their homes, couples unable to afford rents, housing lists growing; or are we observing wealthy speculators manipulating the situation in order to make large profits at the general expense of most others. There is a housing crisis to be sure, it's been building up for decades, successive National Governments, for political reasons, have succeeded in exacerbating it, year on. It is a crisis which is still obfuscated by politicians, mainly due to National Governments ideological bent to markets, thus it remains improperly diagnosed. Are we talking about people not being forced out of their homes, couples unable to afford rents, housing lists growing; or are we observing wealthy speculators manipulating the situation in order to make large profits at the general expense of most others.

Having scanned the official Government documentation; i.e. The Economic Basis for Housing need, I cannot find any conclusive evidence that provision of such housing schemes, will solve urgent housing requirements per se. The policy rests on an aspiration that a certain amount of social housing has to result from private developments; but in practice does it? Such housing, in the main attracts purchasers who already are adequately housed, it doesn't necessarily follow that social housing requirement would also be met by any take up along the chain of housing vacated concomitantly alongside sales. At the procurement stage of new build homes, there are many ways any social housing element, built-in to any development, can be reduced; e.g. S106 agreements, appeals and 'subject to economies'. Even if they are agreed under a S106 agreement, houses seen as starter homes are generally out of reach for people on the local Borough's waiting list, who might want to buy; similarly rents.

The data for the need to build houses - the strategic Housing Market Assessment (SHMA), originates mainly from interested parties, and it's usually stamped as commercially confidential; IMO, it's skewed, inaccessible and uncontestable. Worst still, the policy for gross invasion into the Green Belt is actually being driven by similar, if not the same interested parties, many of whom donate large amounts to fund the Party in Government. So access to analyse, let alone accurately judge whether these figures represent reality, is somewhat limited. One thing is for sure; if anyone wants to move house within our parishes, you only have to go to the nearest estate agent, you won't find it a problem to locate something to your liking. No one is saying a moratorium on private house building, far from it, but you don't necessarily need mass estates built to increase choice, especially when that in itself is likely to lead to the destruction of an environment that you desired in the first place. There are however, accessible and easily understandable statistics available from Local Authorities, showing accurate housing requirements in the Borough; i.e. numbers and categories of folk registered on the housing list. If that housing NEED was met PROPERLY and as a priority, then the pressure for private building development would diminish, and similarly the pressure on the GB.

It should be clear to those trying to administer the Governments plan, that the crisis started over thirty years ago with another market based policy: Local Authority Housing stocks were systematically reduced by the tax payer subsidised
policy of the 'Right to Buy'. In one foul swoop thousands of dwellings were taken from local authority stocks, and not replaced by new build. The result was, despite some heroic efforts made by LA's and the formation of Housing Associations, that social housing struggled to keep pace with demand. Private rented accommodation was supposed to provide where the L.A. could not, or rather, was prevented doing so; that too was a failure. Nearly 40 years on, Central Government now is imposing an even worse policy, via it's Housing Bill. Sanctioned in May 2016, once again the private sector is seen as the panacea to the lack of rentable accommodation and a gateway to house ownership for all; bizarre! Municipal stock that remains, as well as prime Housing Association stock, will be forcibly sold off via the 'right to buy' mk 2 - at a major cost to the tax payer, again.

As the private sector has historically failed to provide affordable rented accommodation, it is hard to see how such a policy will succeed this time round, especially now that matters emanating from the issue affect most all households, not just those renting Council or H.A. houses. The Governments vision of a home owning utopia is not only unrealistic, but in life, undesirable. You don't need to own something to call it your home: rented accommodation that is well managed and reasonable to pay for, is a way forward for many who want a home proper whilst keeping their mobility, be able to save, and able to plan their future without the burden and responsibility of a mortgage and all that might entail in keeping up with payments. It is the rented sector that has been scandalously neglected IMO by successive Governments; it is this sector in which the L.A. could and should, play a rightfully important role once again. So IMO, the Plan is an ideological sledge hammer, it masks alternative strategies that would not incur the gross diseconomies which will undoubtedly spring from implementation of the Governments Plan.

**Attached documents:**

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**Comment ID:** SQLP16/787  **Respondent:** 15360065 / Alan Staines  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

Major doubt concerning housing numbers.

The derivation of a mathematical model of a Strategic Housing Market Assessment (SHMA) without disclosure of the hypotheses and postulations used or of, for example, standard deviation in the results clearly does not permit any assessment of its validity and reflects poor scientific practice.

The doubt concerning this SHMA target housing figure is further compounded by the Guildford Borough Council inflating the SHMA figure to give a figure for population increase which is almost 70% higher than the official national estimates for population growth in the Borough.

This results the figure of 593 new houses proposed in the Horsleys within 5 years following adoption of the plan.

The scale of this enormous increase is demonstrated in that it would result in an increase of up to 35% in existing West Horsley households - a truly alarming figure and greater than any other single area in the Borough.

I trust that my concerns will be fully considered by the appointed independent inspector.

**Attached documents:**

---

**Comment ID:** SQLP16/791  **Respondent:** 15367361 / Greg Ganjou  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()
1. **Questions posed by Guildford Borough Council as part of its consultation.**

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**
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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

**Comment ID:** SQLP16/815  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:**

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

---

3. QUESTION 1 – The Evidence Base and Submission Documents.

We do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites, as it relates to site A46 and the need for a new secondary school at that site, is adequate, up-to-date and relevant.

Our reasoning, using the Evidence Base, is given as follows.

3.1 Provision of Education in Surrey

The responsibility for provision of Education in Surrey lies with Surrey County Council, not GBC. SCC annually produces a report, the latest being the *Schools Organisation Plan December 2015* (“SOP”). The SOP has a 10 year outlook, and does not call for a new secondary school requirement within this timeframe; therefore SCC in the SOP, as informed by the 2014 draft Local Plan and its inherent new housing plan, is not calling for building of a new secondary school in Guildford Borough in the period to 2025.

In terms of school sustainability and operating efficiency, SCC states that schools have to operate full or nearly (95%) full, and that any schools with more than 25% surplus places will be viewed by SCC as educationally and financially unsustainable; where possible SCC seeks to take action early to ensure that schools do not reach this point of unsustainability. Furthermore, SCC prefers to see existing schools expand rather than develop new schools, since this is a more efficient and sustainable use of infrastructural, economic and human capital.

Also, SCC state that, to be sustainable, a new secondary school has to have a minimum of 6FE. The two other new secondary schools at strategic sites Wisley and Gosden Hill are proposed in the LP:ER to be 4FE, which would be below the SCC threshold of sustainability, since both of these schools are in areas of higher population density and are sustainable strategic sites it is evident that these schools should be increased in size to 6FE each, should it not be proven that existing schools cannot be expanded to meet any future needs.

3.2 Proposed development does not require an 8FE secondary school

The proposed development of 1,100 dwellings on site A46 would result in a secondary school requirement of one Form of Entry (30 places) (Source LP:ER). Therefore the proposed A46 development does not, in itself, require provision of an 8FE secondary school at the site.

3.3 Proposed new secondary school at Site A46 is in wrong location
Site A46 in the Normandy ward is located in a sparsely populated area of the borough (Refer to the housing density map contained in the LP:ER, below), therefore is situated remotely from potential pupils, causing unsustainable travel requirements to fill the school places sufficiently to achieve and maintain school sustainability required by SCC. The justification for the school made in SED3 is that it serves the surrounding area, however the on the Evidence Base contained in the draft Local Plan, Normandy and the surrounding area does not need a secondary school.

[IMAGE 1]

3.4 Local Plan itself shows a secondary school is not needed at A46

According to the LP:ER, Site A46 is located in a ward that does not need additional education provision at all during the life of the Draft Plan, and is immediately adjacent to wards that either also do not need additional education provision over the life of the plan, or are only affected in the first 5 years of the plan i.e. before a secondary school could be built. Area 46 is distant from the wards that are affected over the whole life of plan (refer to map below reproduced from the LP:ER). Therefore location of a secondary school at A46 is unsustainable according to both SCC and GBC principles.

Pupils in Ash South and Tongham and Ash Vale also avail themselves of Secondary Schools in Hampshire (Farnham and Aldershot) further reducing need for a new secondary school in Normandy.

[IMAGE 2]

3.5 Declining birth rate in Guildford

The birth rate in Guildford is declining, reducing the future need for school places.

[IMAGE 3]

3.6 Existing secondary school capacity exists

Representations have been made by the head teachers of various Secondary Schools to the 2014 Draft Plan and to GBC and SCC, stating that they have existing capacity to take new pupils, and that they also have space and infrastructure to permanently expand. This is in accordance with SCC’s school sustainability policy of using under-utilised existing capacity and of expanding existing schools in preference to developing new schools.

3.7 Migration to UK to decline

Following the Brexit vote, government and commentators agree that migration into the UK will decline significantly once the UK exits the EU. This will naturally reduce the demand for housing and education within Guildford Borough, further negating the justification for a new Secondary School at site A46 at Normandy/Flexford.

3.8 A new secondary school at site A46 is unsustainable.

A new secondary school at Normandy is not sustainable on many levels, some being:

- It is not demonstrated that there will be sufficient pupils from the surrounding area to maintain 95% capacity.
- The site is in a sparsely populated area of the B
- The Local Plan shows that Normandy is a ward that does not need additional secondary school provision over the life of the Plan.
- If any extra secondary provision is needed, it is to the east or north, not west of the borough.
- Road transport infrastructure to the site has limited capacity without major changes to infrastructure.
- The site destroys greenbelt, ancient woodland, vulnerable habitats, impinges on listed buildings and is located on an area of important drainage for flood mitigation.
- Heavy clay soils will give rise to unusable playing and sports fields.

We note that the Sustainability Appraisal of the Guildford Borough Local Plan, June 2016 (“SA”) does not deal with education sustainability nor considers the sustainability of transport and infrastructure requirements arising from
education needs arising from the draft Local Plan. In respect of education, the SA merely makes some high level, self-serving and unsubstantiated comments with regard to spatial strategy.

**Attached documents:**
- [IMAGE 1.png](image) (2.2 MB)
- [IMAGE 2.png](image) (3.2 MB)
- [IMAGE 3.png](image) (387 KB)

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**Comment ID:** SQLP16/829  **Respondent:** 15370593 / A Gee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

1. **Questions posed by Guildford Borough Council as part of its consultation.**

Questions from GBC

**24.A. Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in [Appendix D](image) and can be found on our [website](image) (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

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**Comment ID:** SQLP16/844  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()
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Comment ID: SQLP16/859  **Respondent:** 15381089 / Tim Poyntz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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Attached documents:

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Comment ID: SLP16/872  Respondent: 15386017 / Gareth Sinnett  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

1. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

20.A. Question 1: The evidence base and submission documents

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Attached documents:

Comment ID: SQLP16/903  Respondent: 15389697 / Oliver Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Attached documents:

Comment ID: SQLP16/917  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.
I wish to register my objection to the above plan for the following reasons:

1. Lack of protection for the Green Belt
2. Disproportionate housing development in our area, resulting in over-loaded schools, health services and public transport
3. Major traffic congestion on already vastly overcrowded and congested roads
4. Air pollution from thousands of extra cars affecting children and the elderly
5. Pedestrian and cyclist safety on crowded local roads with no footways
6. No guarantee of enough affordable housing for young families.

These are just the immediate concerns, but as a local resident who drives to Kingston every day to work, and also has to use the local roads at peak travel times, the congestion on the local roads is already appalling.

Attached documents:

Comment ID: SQLP16/929  Respondent: 15400833 / William John Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

A46. A47. A50.

Normandy and Flexford. I object because this area was not included in the previous consultation. In 2014 it was ‘safeguarded’ and not removed from the greenbelt, and no exceptional circumstances have been put forward.

Attached documents:

Comment ID: SQLP16/944  Respondent: 15405857 / Raymond Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

1. Questions posed by Guildford Borough Council as part of its consultation.

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

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**Comment ID:** SQLP16/948  **Respondent:** 15406017 / Eleanor Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

I attach my response to the Guildford Borough Proposed Submission Local Plan.

Having considered the terms of the planning policy I OBJECT. This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I was born and grew up, until the age of 24, in the Guildford area. Having moved to London to work in recent years I have always considered Guildford and particularly Clandon to be an area I would like to return to raise a family. These plans would fundamentally change my view of Guildford and the surrounding areas. In addition, my parents still live in West Clandon and I therefore have a strong vested interest in the proposed plans.

I trust that the objections included in the attached are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**Attached documents:**

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**Comment ID:** SQLP16/949  **Respondent:** 15406017 / Eleanor Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()
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Comment ID: SLP16/953  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:
1. **Questions posed by Guildford Borough Council as part of its consultation.**

Questions from GBC

24.A. **Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

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**Attached documents:**

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**Comment ID:** SQLP16/1857  **Respondent:** 15423201 / Alex Bailey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

**Road network**

I object to the plan on the grounds of the impact to the local road network, which I do not believe has been adequately addressed. 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 almost inevitably true for the proposed developments in East and West Horsley as well.
I am a householder in West Clandon village and I wish to make the following comments on the above document:

Question 1: Evidence Base. I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

- The evidence base documents do not yet reflect the post-referendum circumstances. The documents and the Plan must be modified to these into account.
- The Transport Assessment document is detailed and was published too late to study its detailed conclusions. The document appears to show that congestion will worsen significantly over the period of the Plan even if all the proposed infrastructure is built. The assessment is inadequate because it does not include the effects of junctions and averages flows over 3hr periods thus masking the impact of peaks.
- The SHMA attempts to justify an OAN based on a very aggressive desire for growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are not transparent and have not been adequately scrutinized by Councillors so that people have to take on trust the work of a consultant. In any case events have overtaken the SHMA.
- The number and complexity of the documents in the evidence base have made reading, understanding, analysis and assimilation extremely difficult. The relevance and status of some of the documents is unclear.

Attached documents:

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Attached documents:

Comment ID: SQLP16/1052  Respondent: 15439585 / Bryan Handcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

The local roads are not suitable to cope with the amount of traffic hundreds of houses would generate.

Attached documents:

Comment ID: SQLP16/1067  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Attached documents:

Comment ID: SQLP16/1068  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Attached documents:

Comment ID: SQLP16/1089  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

24. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

24.A.Question 1: The evidence base and submission documents

"The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

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Attached documents:

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**Comment ID:** SQLP16/1098  **Respondent:** 15446273 / Jane Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

N/A

Attached documents:

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**Comment ID:** SQLP16/1113  **Respondent:** 15448321 / Nicole Mapplebeck  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

**Question 1: The evidence base and submission documents**

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**Comment ID:** SQLP16/1114  **Respondent:** 15448335 / Emily Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:**

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**Attached documents:**

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**Comment ID:** SQLP16/1115  **Respondent:** 15448385 / Edward Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:**

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Section page number 256 of 321 Document page number 257
Question 1: The evidence base and submission documents

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Attached documents:

Comment ID: SQLP16/1177  Respondent: 15459297 / Mark Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

In addition I attach the reasoned objections to the whole dreadful Guildford Plan which is opposed by virtually all the Villages Around Guildford and most of the Guildfordians and our local MP Sir Paul Beresford. Compiled by Andrew Procter.

Attached documents: Andrew Procter Objection to GBC Local Plan 11 July 2016.doc  (267 KB)

Comment ID: SQLP16/1950  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

GRA Comment: Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates housing need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

Strategic Housing Market Assessment

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS (see Appendix 1) has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year. It also advises the SHMA method should be changed to consider student housing need separately due to the distorting effect of students on the overall Objectively Assessed Need (OAN) forecast.
The current SHMA inflates the proposed housing figure due to

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

The SHMA needs to be revised, and the proposals based upon it reconsidered, before the Plan can be viewed as ready for submission to an Inspector. In addition, an immediate start should be made on calculating student requirements separately using a consultant with appropriate expertise. It is probable this exercise will reduce the OAN.

Revision of the SHMA to take account of the consequences of the vote to leave the European Union has been proposed by a number of consultees and the Council leader. The NMSS SHMA Review makes an important contribution to the way ahead in several respects by showing that:

- even with a relatively strong pre ‘Brexit uncertainty’ economy, and using a stronger trend period than the one used by GLHearn for migration flows within the UK, the GLHearn OAN figure was too high.
- simply making a few post ‘Brexit uncertainty’ adjustments to economic and demographic need, as currently calculated by GLHearn, would not be an adequate response because their approach to the economic data is flawed and they have not corrected for large errors in the historical data on international migration,
- student flows should be better understood and separated out to avoid distortion of the forecasts and, especially given the significance of flows of international students in Guildford, separate modelling of the student population will become more significant in future.

NMSS has advised that the new projections issued on 12 July 2016 should make little difference in Guildford as the household formation rates on which they are based are not significantly different from the 2012-based set.

It is most disappointing that demographic and economic model assumptions have been withheld by GLHearn so that the whole process cannot be cross checked. This means the OAN taken from their SHMA cannot be substantiated.

Green Belt and Countryside Study

This does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing instead in major settlements beyond the Green Belt.

- The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Eg It could be argued the sweep of open countryside rising up Gosden Hill, as you approach Guildford along the A3, is highly prized.
- Proposed removal of the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.
- Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt as seen from surrounding AONB.

Transport Evidence

This has been produced very late and is incomplete and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

- It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. We assume various inconsistencies are errors (eg 1000 homes on Slyfield generating no extra traffic). More information is needed to understand how much congestion will occur, and where. This has not been provided in time to inform Plan proposals or
responses. The analysis points out problems across the network and does not support the claim that the highways network can accommodate the additional demand arising from the Plan.

- The available evidence shows that the Sustainable Movement Corridor is in a preliminary stage of development. The information provided indicates that it cannot achieve its intended objectives along much of its route due to narrow roads and pinch points. The original concept has had to be diluted and impact on other routes, demand and an economic business case are required. The very concept of a single linear route as appropriate for Guildford is unproven.

- Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

- No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

- Information about the town centre as regards traffic, buses and parking is lacking in the Plan. The Plan does not address the traffic issues in the town centre. The Council has announced its intention of implementing the Town Centre Master Plan which includes making better use of the asset of the river. We submit that the Plan should include the protection of a route for a new bridge connecting the east and west parts of the town across the railway to maintain accessibility and to provide greater resilience in this key part of the road network.

For more detail refer to Appendix 2.

Please Note: Additional transport information has been requested which it was not possible for Guildford BC and Surrey CC to provide in time for this submission. A list of the relevant questions has been submitted. GRA wishes to reserve the right to follow up aspects of this submission where lack of transport information (data or model assumptions) or absence of clarification leads to gaps or errors in analysis and observations.

### Guildford Retail and Leisure Study

This is an improvement but the credibility of the case for massively expanding retail space is undermined by trends in retailing and by the repeated failure to implement the North Street development. The economic value of the green and historic character of Guildford is not adequately considered.

### Air Quality and Noise

NO2 emissions need careful monitoring in view of some sites being close to limits, revised estimates of premature deaths, issues with vehicle emission controls and misplaced optimism regarding congestion. Traffic noise from the A3 should also be reported.

### Attached documents:

Comment ID: pslp17q/500  
**Respondent:** 15460737 / Donna Collinson  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** ()

Q 1 The evidence base and submission documents

**Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report: high level review of potential key changes in the Guildford borough PSLP: strategy and sites June 2017**

1. This presents a qualitative assessment of the effect of the changes made to the 2016 plan on traffic forecasts. Essentially, because the amount of development in the plan has been reduced, GBC’s argument is that things will be better than estimated in 2016. We can readily agree that where development sites have been removed, notably as in the case of the Normandy/Flexford strategic site, the forecast traffic level will be lower in the
vicinity of the development. However, there are some sites where the planned development is now greater than in 2016. There are also potential changes to plans outside the borough to be taken into account, such as Dunsfold Park, which may have significant consequences for Guildford, as was pointed out by SCC and GBC in their submissions to Waverley in response to that planning application. The trip rates used in the forecast assume a level of public transport use and an appropriate level of bus services.

2. On the evidence provided by the SHAR based on the 2031 traffic forecasts using the SCC traffic model, congestion will be widespread in peak periods across much of the highway network, including on strategic routes. The A3 and M25 are forecast to be at or over capacity. The cumulative effect of the additional traffic generated by the developments in the plan will be to increase congestion, even with the proposed highways schemes in place. Interpreting the model results is not straightforward, as was pointed out in response to the 2016 consultation. Table 4.12 is significant – showing the roads with the ten largest ratios of flow to capacity for Scenario 3, which includes all the planned development but not the major strategic route improvements on the A3 and M25. There is no equivalent for Scenario 5 (i.e. with the strategic improvements), but we can infer that all the roads in Table 4.12 will be at or over capacity in Scenario 5.

3. With regard to the comments on Policy A6: North Street redevelopment (page 9), the model used for the Strategic Highway Assessment is not sufficiently detailed to provide a satisfactory assessment of conditions on the town centre road network. This has been recognised by GBC and has led to the commissioning of more detailed analysis using a simulation model. Added to which, there is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the draft Town Centre Regeneration Strategy, which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of such a reduction will be far-reaching.

4. 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.

5. The improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 S-bound carriageway, nor an understanding of the implications of the SMC for the allocation of highway capacity on the local roads. What is self-evident is that the pressure on local roads in Burpham is already intense in peak periods, and these roads are not suited to carrying large volumes of traffic. Under the plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demand to the A320 and roads in Jacob’s Well.

6. The change to Policy A29: Land to the south and east of Ash and Tongham involving more houses means that there will be more traffic locally. While this will not be ‘major’ in terms of the borough as a whole, it will be significant locally. Ash and its surroundings will be impacted by the large Wellesley expansion in Aldershot. It is not clear to what extent the modelling reported in the SHAR allowed for this development. The pressure on the A331 and the roads connecting Aldershot to Guildford and Woking will increase.

7. The M25 is forecast to be at capacity after the planned improvements have been introduced, as shown both in the SHAR and in the recently published DfT/HE report on the South West Quadrant. This is relevant to Policy A35 Wisley airfield. It should be noted that RHS Wisley is expanding its facilities with the aim of significantly increasing visitor numbers. The DfT/HE Stage 3 report concludes that the focus should not be on widening the existing road further beyond currently planned schemes but on how to reduce pressures and provide parallel capacity to relieve this part of the network. If the M25 and A3 are at capacity, then the Wisley development will add pressure on local roads that are not well-suited to carrying higher volumes of traffic. This is also relevant to the proposed developments at Burnt Common. The consequences for Ripley are likely to be serious. It is noted that Policy A35 now includes a requirement for mitigation of impacts in Ripley and on surrounding roads, which is some recognition that there will be a problem.

8. A comprehensive up-to-date analysis is required to inform decision-making. This should include analysis of the mid-term stage of the plan, before the A3 improvement is complete, as well as 2034.
1. Section 1 Overview. The description of existing conditions and challenges is broadly correct and welcome.
2. Section 2 Surface access to airports. The problem is that the improved A3 will be at or over capacity in peak periods under the Plan, and the M25 SW Quadrant study has concluded that the M25 will be overloaded. So surface access to Heathrow from Guildford will continue to be affected by the weaknesses listed in this section.
3. Section 3 Rail. This section is welcome. However, it is noted that Crossrail 2 has not yet been secured.
4. Section 4 Strategic roads. Surely the strategy should be aligned with the position of Highs England set out in the Topic Paper: Transport, where it is evident that the improvement of the A3 will not be completed until 2026/27, or even 2027/28? The removal of schemes SRN1 and SRN6 from the list of key infrastructure for the plan, and redesignating them as ‘aspirational’ is inconsistent with the safety objectives of the borough and surely of Highways England and Surrey County Council (the highway authority). Under the strategy and the Plan, the issues for Beechcroft Drive and the weaving and merging issues on the existing A3 will not be addressed until half way through the plan period.
5. Section 5 Local roads. While welcoming the aspiration to transform the town centre, the traffic implications have not been dealt with in the strategy or the Plan. Section 1 correctly included the issue of “severance of the town and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey”. The case for a new crossing of the river and railway relieving pressure on the Farnham Road railway bridge should be taken very seriously and examined in depth. There is a real risk that a significant reduction in capacity in the town centre, both the gyratory and Walnut Tree Close, and on routes carrying the SMC, will lead to road users transferring to minor roads around the town that are unsuited to carrying more traffic.
6. The M25 SW Quadrant study report recommends that alternative routes are developed to carry orbital traffic, and this could mean more use of the A31/A331 in Guildford. There are local roads where capacity is already an issue and planned growth will add to problems that are not mentioned in this strategy. The scope of this element of the strategy is not wide enough.
7. The bus transit strategy is welcome. However, there is insufficient information on the Sustainable Movement Corridor to gauge either what it might deliver and its potential impact on road capacity. A high quality bus station in the town centre is critical for the future of the town. There is a lack of park and ride on the east of the town and not even an aspiration for future provision.
8. The active modes strategy is welcome. However, many roads in the borough are two-lane carriageways of restricted width, with little scope for allocating space for cyclists, and this has to be either accepted or addressed over the long term.
9. Section 6 Air quality. If traffic is going to increase in aggregate, as the forecasts show, even with the measures being proposed, then air quality will continue to be a concern.
10. Section 7 Road safety. The proposals are welcome, but as stated above, the schemes SRN1 and SRN6 should be reinstated in the Plan for safety reasons.
11. Section 8 Programme and funding. See comments on Topic Paper: Transport and the Infrastructure Schedule (App C).

**Topic Paper: Transport**

1. This is a helpful paper providing context and background to the transport aspects of the Plan.
2. The fact the new supplementary technical work is planned to be carried out prior to the submission of the plan to the Secretary of State (para 3.18) is welcome, but it would have been better if the results had been available for this consultation.
3. It is recommended that the wider evidence base should be expanded to include the following:
24. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:
24. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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<th>Comment ID: SQLP16/1218</th>
<th>Respondent: 15474849 / Timothy Yorath</th>
<th>Agent:</th>
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**Attached documents:**

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**Comment ID:** SQLP16/1232  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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**Attached documents:**

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**Comment ID:** SQLP16/1758  **Respondent:** 15478209 / Sally Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

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Attached documents:

Comment ID: SQLP16/1265  Respondent: 15481409 / Amy F Corstin  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Attached documents:

Comment ID: SQLP16/1291  Respondent: 15485217 / Fiona MacKenzie  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

- lack of any real information as to how the Council plans to deal with the additional traffic on the already congested road structure, PLUS plans (if any) to deal with increased pollution and deterioration of air quality.

Attached documents:
1. I object to GBC not providing a readable, concise summary and for the continuation of releasing new data after the Plan was published in June 2016.

Attached documents:

The transport evidence is weak and major issues are unresolved. The Hindhead Tunnel (a great success) has impacted on Guildford and now A3 disruption is mostly centred on Guildford. The topography of hills & river make it difficult but a realistic plan is required.

Attached documents:

Guildford borough Proposed Submission Local Plan: strategy and sites (June 2016)

Thank you for consulting Elmbridge Borough Council on Guildford Borough's Proposed Submission Local Plan.

As you know, we are keen to work with you and other authorities within our respective Housing Market Areas to seek to meet needs across the wider area, ensuring the best and most suitable sites are brought forward for development and, that other cross-boundary and strategic planning matters are continuously addressed.

In responding to this latest consultation, we note that a number of the points we previously raised have been addressed. This consultation response therefore focuses on outstanding matters and those which have arisen from examining newly published and updated evidence base documents. Please note we have not been able to review the entire Proposed Submission Local Plan and all supporting evidence base documents in detail. As such, we continue to raise a number of queries I comments on the key topics that are of particular importance to Elmbridge Borough Council.

Attached documents:

Comment ID: SQLP16/1349  Respondent: 15502209 / Shirley Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Comment ID: SQLP16/1299  Respondent: 15485665 / Lynne Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Comment ID: SQLP16/1297  Respondent: 15485601 / Tim Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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<th>Comment ID: SQLP16/1348</th>
<th>Respondent: 15502241 / Richard Atkinson</th>
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In addition I attach the reasoned objections to the whole dreadful Guildford Plan which is opposed by virtually all the Villages Around Guildford and most of the Guildfordians and our local MP Sir Paul Beresford. Compiled by (Mr) Andrew Procter.

Attached documents: Andrew Procter Objection to GBC Local Plan 11 July 2016.doc (260 KB)

Comment ID: SQLP16/1319  Respondent: 15502913 / Lesley Leheup  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents 

Answer: ()

These comments on the Guildford Local Plan I agree with and wish them to be lodged on my behalf. 

Attached documents: EHPC_Local_Plan_Response_13.06.16 (2).pdf (278 KB)

Comment ID: SQLP16/1327  Respondent: 15504001 / Margaret Banks  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents 

Answer: ()

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Attached documents:

Comment ID: SQLP16/1706  Respondent: 15570817 / Tom Edelsten  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents 

Answer: ()

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Attached documents:
Transport:

The evidence on future traffic conditions which has been provided in the Strategic Highway Assessment Report was produced late and is incomplete. Critical information on congestion has not been given in time to be taken into account in the plan proposals.

Attached documents:

| Comment ID: SQLP16/1404 Respondent: 15571617 / Bruce Garbutt Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents |
| Answer: () |

**Question 1: Evidence Base. I do not agree** that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

- The evidence base documents take no account of the radically changed environment and outlook following the BREXIT referendum. This is hardly the fault of the Council but is nevertheless a serious flaw and requires a re-evaluation of the strategic context.
- The Transport Assessment was published at the same time as the Plan leaving little time for study and analysis. The projections contained appear to be quite inadequate in that 1) they average congestion over 3-hour time bands, which materially reducing the impact of congestion and 2) they do not model junctions.
- The “Assessment” shows that congestion will worsen significantly over the period of the Plan even if all the proposed and aspirational infrastructure is built.
- The Strategic Housing Market Need (SHMA) attempts to justify an Objective Assessed Need (OAN) based on a very aggressive desire for economic growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are opaque and have not been adequately scrutinized by Councillors. Consequently people have to take on trust the work of a consultant. In any case, political events have overtaken the SHMA.
- The number and complexity of the documents in the evidence base make reading, understanding, analysis and assimilation extremely difficult.

Attached documents:

| Comment ID: SQLP16/1391 Respondent: 15571937 / S Bennell Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents |
| Answer: () |

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<th>Comment ID: SQLP16/1416</th>
<th>Respondent: 15577665 / Grant Angus</th>
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I also object to the lack of evidence for the alleged housing need numbers and what seems to be a total lack of consideration of the local infrastructure that at certain times of the day is already under extreme pressure.

Attached documents:

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<th>Comment ID: SQLP16/1430</th>
<th>Respondent: 15579969 / Candice Carrington</th>
<th>Agent:</th>
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In addition, there has been very little information provided to the residents from the Local Council and we had to be alerted to the information on the website by community members. There has therefore, not really been a reasonable chance for locals to know about this consultation period which seems not very open and within the spirit for such a large decision. It seems more reasonable that the Council could have distributed some leaflets to ensure that those affected would be given a fair chance to read and digest the plans for such an important proposal.

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Attached documents:

Comment ID: SQLP16/1474  Respondent: 15583169 / Poul Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Comment ID: SQLP16/1489  Respondent: 15584161 / Alexandra Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

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Attached documents:

Comment ID: pslp17q/667  Respondent: 15584513 / Transport for London (Richard Carr)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()

There is an acknowledgement of the important role of Crossrail 2 in the supporting transport topic paper and transport evidence base although this has not been explicitly recognised in the Local Plan strategy. Inclusion of Crossrail 2 in the transport topic paper and transport evidence base is welcomed. However, the explanatory text in section 5.25 on rail schemes needs to be updated as follows:

Options are set out, including the Crossrail 2 scheme, which in combination would remove the capacity constraint on the South West Main Line between Surbiton and Waterloo and allow for an additional 13 trains per hour peak services forecast to be required by 2043. The Government and TfL have subsequently announced funding for the development of Crossrail 2 which is expected to be operational in 2033. Schemes to provide grade separation at Woking Junction and an additional through platform at Woking station will also be required.

Attached documents:

Comment ID: SQLP16/1500  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

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Comment ID: SQLP16/1514  Respondent: 15585601 / Sophie Corstin  Agent:

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Comment ID: SQLP16/1521  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I object
Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure I object

The infrastructure schedule makes reference to ‘improvements’ without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these ‘improvements’ will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). (Some existing buildings already reach 5-7 levels in height).

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am
particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment: OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have. The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation. Indeed it does not correspond to the statistics generated by the Vehicle Activated Signals which have been monitoring traffic speeds through Compton for a number of years.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

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The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill-thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

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The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the ‘Guildford urban area’ when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford ‘needs’. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to ‘double accounting’ as the uplift is introduced at several stages and
the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA) I Object

The ‘objectively assessed need’ figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

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The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as ‘unsuitable’ with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study I object

GBC’s Green Belt & Countryside Study does not value appropriately the ‘fundamental aim’ of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for ‘informal recreation’. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.
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Attached documents:

**Comment ID:** SQLP16/1635  **Respondent:** 15601057 / Chris Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

**Comment ID:** SQLP16/1654  **Respondent:** 15602177 / Julia Hunt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Answer:** ()

**Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.**

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

**The Employment Land Needs Assessment**

**I object**

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood.
Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

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The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**Infrastructure**

**I object**

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

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**I OBJECT**

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.
The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

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**Attached documents:**
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<th>Comment ID: SQLP16/1676</th>
<th>Respondent: 15603489 / Simon Pitt</th>
<th>Agent:</th>
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2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**Attached documents:**

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<tr>
<th>Comment ID: SQLP16/1680</th>
<th>Respondent: 15604289 / Lesley Pitt</th>
<th>Agent:</th>
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**Attached documents:**
Comment ID: SQLP16/1684  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: (No)

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Attached documents:

Comment ID: SQLP16/1688  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.
The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

Comment ID: SQLP16/1700  Respondent: 15611553 / Edmund Hodges  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents 
Answer: ()

The West Surrey Strategic Housing Market Assessment which informed the provision made for housing in the plan should be revised to reflect the latest 2014 based household projections and the provision proposed in the draft plan increased accordingly.

Attached documents:

Comment ID: SQLP16/1702  Respondent: 15612481 / Gillian Culmer  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents 
Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

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Attached documents:

Comment ID: SQLP16/1722  Respondent: 15615745 / Nicholas Thompson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents 
Answer: ()
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

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<th>Respondent: 15618305 / Lawrence Claridge</th>
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The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:
Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that
buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.
The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town
(the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

**Strategic Housing Market Assessment (SHMA)**

**I Object**

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

**The Land Assessment**

**I object**

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

**Green Belt & Countryside Study**

**I object**

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should
not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

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<th>Respondent: 15636481 / Peta Lawrence</th>
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The Draft Local Plan is an extensive document. It is difficult for ‘laymen’ to assess this within the time limits set by the council. More time for proper assessment is needed.

Attached documents:

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<th>Comment ID: SQLP16/1845</th>
<th>Respondent: 15650369 / Stephanie Dean</th>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

- The evidence base documents take no account of the radically changed environment and outlook following the BREXIT referendum. This is not the fault of the Council but nevertheless means the plan is not based on actuality and requires a re-evaluation of the strategic context.
- The Transport Assessment was published at the same time as the Plan leaving little time for study and analysis. The projections contained appear to be quite inadequate in that 1) they average congestion over 3-hour time bands, which materially reducing the impact of congestion and 2) they do not model junctions.
- The “Assessment” shows that congestion will worsen significantly over the period of the Plan even if all the proposed and aspirational infrastructure is built, surely this cannot be seen to be acceptable.
- The Strategic Housing Market Need (SHMA) attempts to justify an Objective Assessed Need (OAN) based on a very aggressive desire for economic growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are opaque and have not been adequately scrutinized by Councillors. Consequently people have to take on trust the work of a consultant. In any case, political events have overtaken the SHMA.
The number and complexity of the documents in the evidence base make reading, understanding, analysis and assimilation extremely difficult.

Attached documents:

Comment ID: SQLP16/1849  Respondent: 15650561 / Ellie Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

Objection

Attached documents:

Comment ID: SQLP16/1891  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

On balance it is considered that the Evidence Base used to support this draft Local Plan (as listed within Appendix D - ‘Evidence Base’), is adequate, up to date and relevant.

Attached documents:

Comment ID: SQLP16/1913  Respondent: 15670785 / Mr and Mrs Poulson  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

No.

We do not consider that the Green Belt and Countryside Study is adequate.

Attached documents:

Comment ID: SQLP16/1921  Respondent: 15672737 / Andrew Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()
After long and careful consideration to the proposed Guildford Borough Council ‘New Local Plan’ I would like to OBJECT strongly to a number of the council’s recommendations. If you continue with the new plan in full you will destroy and erode an area that by the council’s own admission is considered an area of natural beauty? Why?

Attached documents:

**Comment ID:** SQLP16/1924  **Respondent:** 15674561 / Andy Stallan (WYG)  **Agent:**

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<tr>
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Allocation of Sites - Burnt Common Nurseries site should be allocated in the Submission Plan

Please refer to the accompanying separate representation submission letter dated 15th July 2016 for details

Attached documents: 160713_LP1_Representation_on_behalf_of_the_NRA_DRAFT_002_2 (1).pdf (287 KB)

**Comment ID:** SQLP16/1936  **Respondent:** 15679041 / Barton Willmore (Emma Wreathall)  **Agent:**

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GUILDFORD BOROUGH LOCAL PLAN

PROPOSED SUBMISSION: STRATEGY AND SITES 2013 - 2033  WRITTEN REPRESENTATIONS ON BEHALF OF PEGASUS LIFE

These representations have been prepared on behalf of our Client, Pegasuslife, and set out comments in response to Guildford Borough Council's (GBC) Proposed Submission Local Plan Strategy and Sites consultation (PSLP, June 2016).

These representations have been prepared in objective terms and assessed against the prevailing planning policy framework, namely paragraph 182 of the National Planning Policy Framework (March 2012) that requires a Local Planning Authority to produce a Plan that 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 alternative, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategy priorities; and
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the

Attached documents:

**Comment ID:** SQLP16/1942  **Respondent:** 15679137 / Turley (Hannah Bowler)  **Agent:**
<table>
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<tr>
<th><strong>Comment ID:</strong> SQLP16/1962</th>
<th><strong>Respondent:</strong> 15682465 / Nick Beesly</th>
<th><strong>Agent:</strong></th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td>Answer: ()</td>
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I am an employee of The University of Surrey who lives locally and am writing in support of the Local Plan and in support of the University of Surrey's part in that plan.

The University plans are robust, professional and show genuine smart growth; they support sustainable transport, relieve critical infrastructural issues and deliver high levels of employment and affordable housing. Those plans need to be prioritised within the Local Plan.

**Attached documents:**

<table>
<thead>
<tr>
<th><strong>Comment ID:</strong> SQLP16/1967</th>
<th><strong>Respondent:</strong> 15686913 / The Barn, Effingham (Adam Powell)</th>
<th><strong>Agent:</strong> Andy Stallan (WYG)</th>
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<tr>
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<td>Answer: (Yes)</td>
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Insofar as it relates to 'The Barn, Effingham' site. Please refer to the accompanying separate representation submission report dated July 2016 for details.

**Attached documents:**  
The Barn Effingham- Local Plan Reps (2).pdf (426 KB)

<table>
<thead>
<tr>
<th><strong>Comment ID:</strong> SQLP16/1999</th>
<th><strong>Respondent:</strong> 15689793 / Gladman Developments (Mat Evans)</th>
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Introduction

Gladman Developments Ltd (Gladman) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, Gladman understand the need for the planning system to deliver the housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.
This submission provides Gladman Developments’ written representations to the submission version of the Guildford Local Plan (strategy and sites). The plan will be followed by a part 2 plan considering issues relating to development management policies.

The plan is at submission stage and therefore has already been subject to public consultation. This submission draft of the plan is one that the Council should consider ‘sound’, which means it should be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Gladman have considered the documentation and accompanying sustainability appraisal prepared by the Council, which support the submission version of the Guildford Local Plan. This representation outlines some brief comments from Gladman with regard the Councils approach to its constraints and its establishment of its FOAHN, and the implications this may have for neighbouring authorities, the housing market area and discussions being undertaken through the Duty to Cooperate.

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>pslp17q/415</th>
<th>Respondent:</th>
<th>15689793 / Gladman Developments (Mat Evans)</th>
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1 EXECUTIVE SUMMARY

i. This submission provides Gladman Developments’ written representations on the Guildford Borough Council Proposed Submission Local Plan Draft for Consultation (regulation 18).

ii. Gladman specialise in the promotion of strategic land for residential development, with associated community infrastructure. These representations concern the following matters:

- Duty to Cooperate
- Sustainability Appraisal
- Vision
- Housing Numbers
- Site Allocations
- Evidence Base

iii. At this stage of the plan preparation process, Gladman consider that there are number of areas the Council will need to address in order to be able to deliver a sound plan, most importantly the housing requirement being planned for.

2 INTRODUCTION

2.1 Context

2.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments’ representations on the Guildford Proposed Submission Local Plan Draft for Consultation (regulation 18).

2.1.2 Through this submission Gladman have highlighted several issues with the Guildford Proposed Submission Local Plan in its current form. We submit that the plan will need to reconsider some of its policies and ensure that its evidence
base is up to date and robust in light of changing circumstances and the potential changes brought about by the Housing White Paper.

2.1.3 To ensure a sufficient supply of deliverable and developable sites and to meet Guildford’s and the HMA housing needs in full, we submit that the plan should be seeking to identify additional sites, and that the process for identifying the sites currently within the plan is in need of further explanation and consideration.

2.1.4 The National Planning Policy Framework (NPPF) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- Positively Prepared – the Plan should be prepared 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 a proportionate evidence base.
- 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.

2.1.5 The current consultation is on proposed changes, as such this representation should be considered in the context of previous submissions made by Gladman.

3 NATIONAL PLANNING POLICY

3.1 National Planning Policy Framework and Planning Practice Guidance

3.1.1 The NPPF has been with us now for over five years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets out the Government’s goal to ‘significantly boost the supply of housing’ and how this should be reflected through the preparation of Local Plans. In this regard, it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:

“To boost significantly the supply of housing, local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements…”
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15” (Paragraph 47)

3.1.2 The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the NPPF, which requires local planning authorities to prepare a Strategic Housing Market Assessment (SHMA), working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).

3.1.3 Once a local authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).
3.1.4 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:

- Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need
- Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.
- The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
- The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

3.2 Housing White Paper – Fixing our broken housing market

3.2.1 A government Housing White Paper was published in February 2017, and included a consultation on changes to planning policy and legislation in relation to housing, sustainable development and the environment, which expired on the 2nd May 2017. Government White Papers are often Command Papers that either contain future legislation or proposals for future legislation, therefore they provide a very clear indication of the direction of travel for government policy, which in this instance relates to Housing. In order to safeguard its local plan position, the Council will need to consider the emerging plan against the points raised within the White Paper, and monitor the progress of the consultation as the proposals within it materialise as potential reforms to the planning system. Given that the intention of the document is to have some of the proposed reforms to come into force by November 2017, it is highly likely that a number of its measures will be relevant considerations prior to the adoption of the plan.

3.2.2 The title of the White Paper makes apparent that the government considers the housing market to be broken, it is also clear from the document forward by the Prime Minister that the cost of housing is a key part of why the housing market is considered broken. In the foreword the Prime Minster states:-

“Today the average house costs almost eight times average earnings – an all-time record.”
“In total more than 2.2 million working households with below-average incomes spend a third or more of their disposable income on housing.”
“We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system.” (Foreword from the Prime Minister)

3.2.3 The second foreword from the Secretary of State adds further to the governments thinking, particularly on the need to build new homes now, it states:-

“This country doesn’t have enough homes. That’s not a personal opinion or a political calculation. It’s a simple statement of fact”
“Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.”
“That has to change. We need radical, lasting reform that will get more homes built right now and for many years to come.”
3.2.4 The White Paper outlines further potential reforms to the plan making process, OAN methodology, and Green Belt consideration and housing delivery tests, amongst others. Gladman will point out key aspects from the White Paper in relevant sections of this representation.

3.2.5 Whilst the document is a White Paper, the Council must give consideration to what it is saying, and how it outlines the need for reform and the need for change in the planning system. It is clear that not delivering the identified housing needs of an area or a HMA is not an option moving forward.

5 SUSTAINABILITY APPRAISAL

5.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.

5.1.2 The Guildford Local Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Guildford Local Plans decision making and scoring should be robust, justified and transparent.

5.1.3 Gladman are concerned that in a previous iteration of the plan the sustainability appraisal supported a significantly more positive approach with the Council considering itself able to deliver 14% above its then significantly higher housing requirement. The current consultation is seeking to deliver a much lower number and Gladman suggest that this approach cannot be justified.

5.1.4 Given the issues expressed above with regard to the Duty to Cooperate, and the need for the Council to consider unmet housing needs the Councils SA is not fit for purpose in justifying it’s substantially lower housing requirement.

6 OBJECTIVELY ASSESSED HOUSING NEED

6.1 Background

6.1.1 The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.

- 6.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a SHMA working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying “the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
  - Meets household and population projections taking account of migration and demographic change;
  - Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
  - Caters for housing demand and the scale of housing supply necessary to meet this demand.”

6.1.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors: Falling household formation rates; net inward migration; the need to address the under provision of housing from the previous local plan period; the results of the Census 2011; housing vacancy rates including the need to factor in a housing
vacancy rate for churn in the housing market; economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth; off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents; addressing affordability and delivering the full need for affordable housing in an area.

6.1.4 Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in §17 of the Framework, which states:

‘...Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.’

6.1.5 Of critical importance is what the Framework goes onto say in §158 in the section discussing Plan Making. It states here:

‘Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.’

6.1.6 Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.

6.1.7 The formal publication of the Planning Practice Guidance (PPG) in March 2014 gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extracts identify some particularly pertinent points.

‘The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.’

6.1.8 The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.

6.1.9 In order to consider how market signals should be taken forward §20 identifies some key concepts:

‘Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.’ (emphasis added)

6.1.10 It is therefore clear that where market signals are apparent (in any of the indicators assessed), there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully bench mark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing.

6.1.11 What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of plans that many local authorities choose to look at periods of time that are not fully representative of the depth of the housing crisis which we are currently within.
6.1.12 The problems are noted in Fixing the Foundations: Creating a more prosperous nation published by HM Treasury in July 2015. In paragraph 9.7 the report states:
‘There remains more to do. As the London School of Economics (LSE) Growth Commission found, ‘under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand.’

6.1.13 Gladman are therefore of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period that would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.

6.1.14 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgment it was stated:

“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. […] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies”.

6.1.15 Therefore, following the exercise to identify the full, OAN for housing in an area, “Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)

6.1.16 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

6.1.17 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above, “Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

- specific policies in this Framework indicate development should be restricted.”
- 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

6.1.18 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.

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6.1.19 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.

6.1.20 The PPG contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

6.2 Objective Assessment of Housing Needs for Guildford

6.2.1 Gladman are concerned with the OAN figure for Guildford and the robustness of the evidence to support it. The SHMA undertaken by GL Hearn for the authorities of Guildford, Waverley and Woking was published in 2016 which set out the full OAN for Guildford to be 693 dwellings per annum. This considered it was necessary to include an uplift to the 2012 household projections to support economic growth, improve affordability and student growth impact. Whilst a fairly positive assessment it was considered that to truly improve affordability this uplift would need to be taken significantly further than the 5% as proposed.

6.2.2 Following consultation on the draft Local Plan, an addendum to the SHMA has published solely for Guildford which is not a full assessment of the HMA. Whilst increasing the affordability uplift, still significantly less than the level it should be, this addendum has significantly reduced the uplift to support economic growth resulting in an OAN less than previously consulted on. It is considered that this is not a robust figure that is positive, justified or effective.

6.2.3 It is expected that the uplift for market signals should be at least 25%, equal to that of neighbouring Waverley, following examination of the Waverley Local Plan where the Inspector considered this to be a more appropriate figure. It is also not considered appropriate to reduce the economic growth uplift and it is considered that the Council are planning for significantly less than what should be the full OAN for Guildford.

6.2.4 We do consider that the SHMA is a robust piece of evidence, nor do we consider the proposed reduction in the housing requirement justified.

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8 CONCLUSIONS

8.1.1 Having considered the Guildford Submission Local Plan, Gladman are concerned about a range of matters including the housing requirement, evidence base, and delivery of some site allocations.

8.1.2 The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance, the Council should look again at its housing requirement and subsequent site allocations, and crucially the assessments that underpin the decisions made.

8.1.3 It is apparent that there are substantial problems with the OAN for Guildford and the subsequent housing requirement derived from it. The Council is failing to meet its requirements in meeting it’s OAN and in contributing to meeting the already known unmet housing needs of the HMA. A number of issues with the GL Hearn OAN methodology were exposed during the examination of the Waverley Local Plan Part 1, these have led to a significant increase in the housing requirement for Waverley. We consider that such an upward adjustment is also required in Guildford. The plan as written is unsound as it is not adequately planning to meet its housing requirements.

8.1.4 Furthermore even should the Council wish to put forward the argument that the constraints of the district mean that it cannot meet its housing requirement, when this requirement has been properly assessed, there is currently insufficient evidence to justify this position. Indeed the Councils previous iteration of the plan was accompanied by evidence that suggested the previously planned for housing figure was both sound and acceptable.

8.1.5 The Guildford Local Plan is therefore considered not to be sound.

Attached documents:
Final comments
Once again, thank you for contacting us. Our comments are based on our available records and the information submitted to us. Please quote our reference number, letter subject and letter date in any future correspondence.

We would like to work with you further on your Local Plan to ensure that all of the potential issues are satisfactorily addressed and to enable Guildford Borough to have a robust, effective local plan that is reflective of national planning policy and your local evidence base.

Attached documents:

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I support both responses submitted from the Downsedge Residents Association and Guildford Residents Association and similarly do not feel that this plan is ready for an inspector

Attached documents:

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I have been following the debate on the Local Plan through the Surrey Advertiser, attendance at a Parish meeting and leaflets that have come through our letter box. No information has been received from GBC despite their promotion of the Local Plan. The Council Leader (Mr. Spooner) and his Deputy (Mr. Furniss) did attend the Send Parish meeting which was good of them. Unfortunately it did nothing to arrest local fears and concerns. The inability to name the developers that have been liaising closely with the Council and the lack of willingness to show the calculations that support the housing number added to the general stench arising from the last minute insertion of Garlick’s Arch into the Local Plan. I like to believe that corruption is something that happens elsewhere but this the Parish meeting left me uncertain. The Deputy’s belief that a motorway style junction is a good idea because it would help build a tunnel under Guildford is demented.

I understand that there is a format that has to be followed to register an objection to the Local Plan otherwise you are simply ignored. But to be clear, I utterly object to developments that contribute to urban sprawl. I’ve spent a lot of time in Houston and have observed at close hand what uninhibited building does. The idea of building on the greenbelt might bring some short term gain to a few developers but we all lose in the long term as Guildford sprawls up the A3 towards the M25. Who are we to wreak destruction on the countryside and leave concrete for those who come after us? In the short term we all lose as the overloaded rail and roads deteriorate further.

Attached documents:
Guildford Borough Transport Strategy 2016

This makes a disappointing read as an initial search for Cycling policies finds them hidden away with Walking in an Active Modes Strategy. These are so important for the future of a healthy, pollution reduced, congestion free Guildford that they should each be given their own separate strategies.

However we comment on the various strategies as listed and request that all bullet points below are incorporated in these strategies:

3 Our Rail Strategy

- The safe cycle storage at Guildford Station should be greatly increased to 2000 bikes and include CCTV cameras for security.
- All other stations should increase safe cycle storage and security.
- A ‘Boris’ bike scheme with both normal and electric bikes should be introduced at Guildford Main and London Road stations to compliment the small Brompton Scheme at the Main station not replace it.
- Cycle access needs to be improved to all railway stations to provide segregated access for cyclists.
- More cycle storage needs to be provided on trains.
- A cycle hub is listed as an improvement with no explanation what this involves? Please explain.

4 Our Strategic Road Network Strategy

- The A3 improvements should include provision for a segregated Cycle super highway from Guildford to London and in the future to Portsmouth.
- The strategic Wooden Bridge footway over the A3 and A25 needs replacing with a wider joint cycling and walking bridge.

5 Our Local Road Network Strategies

Our local roads and parking strategy

- All main A roads through Guildford Borough should have segregated safe two way cycleways to replace the existing footpaths and be shared with pedestrians, eg A25 to Dorking, A246 to Leatherhead, A31 to Farnham, Woking Road and Worplesdon Road.
- Park and rides should have ‘Boris’ bikes (normal and electric) installed with segregated Cycle routes to the Town Centre
- All schools should have Cycle to School plans and all roads within one mile of schools should be 20mph zones

Our bus transit strategy

- The sustainable movement corridor SMC must not be just for buses but must include segregated cycle lanes as well
- There should be cycle storage and Boris bikes at the Main bus station

Our active modes strategy should be split into our cycling strategy and our walking strategy

- Guildford needs to create an integrated safe cycle network throughout the Borough.
- This network needs to start with safe routes through the town centre which need to be designed in accordance with the Master Plan Options for the Town Centre gyratory system. However in the interim period safe routes
must be provided for cyclists to avoid the gyratory and these require in some cases sanctioning shared use of pavements with pedestrians.

- A Town wayfinding cycle map must be provided showing the full network. This should be positioned at strategic notice boards around the town ie the station and also be available as leaflets.
- We support the sustainable movement corridor SMC concept but need to be sure that this will include segregated two way cycle lanes
- On certain routes the sharing of pavements with pedestrians should be encouraged but cyclists need to practice safe cycling etiquette to achieve this and persuade pedestrians to share their surface
- The various cycle routes in the villages should all be integrated into the proposed network such that all villages are linked in.
- New development must incorporate internal safe cycling routes and also contribute financially to the cycling network

7 Our road safety strategy

- Improved facilities are promised for pedestrians and cyclists. Unfortunately as cycling casualties are increasing so is the urgency for the gyratory and the full cycling network to be implemented. Funds must be provided to enable this work to be completed within ten years, not fifteen years as proposed.

Summary

We applaud Guildford for the introduction of the Guildford Borough Transport Strategy 2016 but feel that Cycling is too far down the list of priorities. If Guildford wants to reduce congestion, reduce pollution, and improve the health of its inhabitants, the quickest and most cost effective way is to improve its cycling infrastructure to create a fully integrated network of safe cycle lanes and cycleways. As in London, this can supply the town with a tenfold return on investment, and therefore needs to be implemented immediately as a top priority.

Build it and we will ride it!

Attached documents:

Comment ID: SQLP16/2065  Respondent: 15705857 / GRH Hampshire  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

It is counter to Government policy on consultation. Consultations should be simple and easy to understand by ordinary people. Your document is too dense, full of detail and impossible to comprehend.

Attached documents:

Comment ID: SQLP16/2102  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.
The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/2125  Respondent: 15733665 / Vortal Properties Ltd  Agent: Shrimplin Brown (James Brown)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<tr>
<td>Answer: ()</td>
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</tbody>
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**QUESTION 1: THE EVIDENCE BASE AND SUBMISSION DOCUMENTS**

The majority of the Evidence Base is considered robust, although the Council have not published an update on CIL. This will be a key document in assessing and evaluating the deliverability of sites and other plan commitments, in particular the level of affordable housing sought from new development.

Our client is particularly concerned that the 40% target for affordable housing provision has been determined on the basis of assumptions from the Preliminary Draft of the CIL Charging Schedule. Furthermore, the affordable housing threshold does not take account of National Guidance (see additional comments on Policy H2 below).

Our client would also question the robustness of the Viability and Affordable Housing Study, Peter Brett Associates, December 2014 which was prepared in the context of a Draft affordable housing policy which had already been set and has now been amended and utilises the preliminary CIL figures.

The Council also acknowledge at Appendix D of the Draft Plan that the Local Housing Needs Surveys for settlements are still being updated. This work will be key in understanding the specific balance of housing needs; including specialist housing and care accommodation (see Policy H1). In the absence of this work the Council must ensure that there is flexibility in the allocated uses in Site Allocations to ensure that specialist needs are met. Our client would draw attention to the fact that no provision has been made for specialist retirement or care development accommodation in the Ash and Tongham area, despite the fact that 1,320 units are proposed in this location.

It is imperative that the Council ensure that:

- That the Evidence Base guidance is reflected in the policy approach adopted unless clear justification for departing from the Evidence base is provided;
- That the Evidence Base relied upon is up to date;
- That the Evidence Base is published at an early enough stage in the process and that stakeholders are afforded an opportunity to comment on it before key policy decisions are fixed.
UNSOUND:

The absence of an up to date CIL charging schedule, taking account of responses to the 2015 consultation means that the Council cannot proceed with confidence that the 40% affordable housing target will be achievable.

The absence of the Local Housing Needs Surveys means that specific assessments on housing need or specialist accommodation cannot be made. Accordingly to ensure that the Plan is EFFECTIVE Site Allocations must be flexible in order to allow for a balance of uses to be provided.

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer: ()

The majority of the Evidence Base is considered robust, although the Council have not published an update on CIL. This will be a key document in assessing and evaluating the deliverability of sites and other plan commitments, in particular the level of affordable housing sought from new development.

Our Client is particularly concerned that the 40% target for affordable housing provision has been determined on the basis of assumptions from the Preliminary Draft of the CIL Charging Schedule, 2015. Furthermore, the affordable housing threshold does not take account of National Guidance (see additional comments on Policy H2 below).

Our Client would also question the robustness of the Viability and Affordable Housing Study, Peter Brett Associates, December 2014 which was prepared in the context of a Draft affordable housing policy (now amended in the Proposed Submission Draft Local Plan) and which utilises the preliminary CIL figures.

The Council also acknowledge at Appendix D of the Draft Plan that the Local Housing Needs Surveys for settlements are still being updated. This work will be key in understanding the specific balance of housing needs and the specific local housing requirements.

It is imperative that the Council ensure that:

- The Evidence Base guidance is reflected in the policy approach adopted unless clear justification for departing from the Evidence base is provided;
- The Evidence Base relied upon is up to date;
- The Evidence Base is published at an early enough stage in the process and that stakeholders are afforded an opportunity to comment on it before key policy decisions are fixed locally. This is particular relevant in evaluating the viability of the affordable housing threshold in isolation from a draft CIL charging schedule.

UNSOUND:

The absence of an up to date CIL charging schedule, taking account of responses to the 2015 consultation, means that the Council cannot proceed with confidence that the 40% affordable housing target will be achievable.

The absence of the Local Housing Needs Surveys means that specific assessments on housing need, local housing requirements or specialist accommodation cannot be made. Accordingly, to ensure that the Plan is EFFECTIVE Site Allocations must be flexible in order to ensure that local need is satisfied and the appropriate balance of uses are provided

Attached documents:
QUESTION 1: THE EVIDENCE BASE AND SUBMISSION DOCUMENTS

1.9 The Council have still not published an update on CIL.

1.10 This will be a key document in assessing and evaluating the deliverability of sites and other plan commitments, in particular the level of affordable housing sought from new development and the delivery of new infrastructure. The importance of infrastructure provision is highlighted by paragraph 2.10a which recognises that ‘Pressure on existing infrastructure and additional stress caused by planned growth must be addressed…’ However, in the absence of a joint consultation on CIL it is not possible to critically assess how and when infrastructure will be facilitated and the impact this could have on the delivery of new housing sites.

1.11 Our Client is particularly concerned that the currently proposed 40% target for affordable housing provision has been determined on the basis of assumptions from the Preliminary Draft of the CIL Charging Schedule, 2015.

1.12 Our Client would also continue to question the robustness of the Viability and Affordable Housing Study, Peter Brett Associates, December 2014 which was prepared in the context of a Draft affordable housing policy (now amended in the Proposed Submission Draft Local Plan) and which utilises the preliminary CIL figures.

1.13 It is imperative that the Council ensure that:

- The Evidence Base guidance is reflected in the policy approach adopted unless clear justification for departing from the Evidence base is provided;
- The Evidence Base relied upon is up to date;
- The Evidence Base is published at an early enough stage in the process and that stakeholders are afforded an opportunity to comment on it before key policy decisions are fixed locally. This is particular relevant in evaluating the viability of the affordable housing threshold in isolation from a draft CIL charging schedule.

UNSound: The absence of an up to date CIL charging schedule, taking account of responses to the 2015 and 2016 consultations, means that the Council cannot proceed with confidence that the 40% affordable housing target will be achievable.

Attached documents:

ADDENDUM TO GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN “JUNE 2016” STRATEGIC HIGHWAY ASSESSMENT REPORT (SHAR)

It is recognised that the transport evidence base (SHAR 2016) has not been updated, with no further transport modelling taking place.

The Addendum document notes that “key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan, as identified in the Draft Local Plan 2017, are not considered likely to change the conclusions of the SHAR 2016”. The SHAR 2016 concludes that: “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”.

As noted above, it would be helpful to understand in more detail which developments are expected to come forward ahead of a potential A3 improvement scheme and which developments may be dependent upon a scheme. The management and phasing of the Local Plan developments will be critical to maintain the safe operation and performance of the SRN.

TRANSPORT TOPIC PAPER JUNE 2017

1. Evidence Base


With regard to the Addendum Strategic Highway Assessment Report it is noted that “GBC, with Surrey County Council, we will be undertaking new supplementary technical work prior to the submission of the plan to the Secretary of State. This will respond to the remaining issues raised by Highways England on the strategic highway assessment”.

Highways England looks forward to working with GBC and Surrey County Council to take forward the supplementary technical work. This would likely include outputs from the forthcoming update to Surrey SINTRAM model and be used to inform updates to the Infrastructure Delivery Plan supporting the Local Plan. Further the supplementary technical work could help inform a Statement of Common Ground or similar between Highways England, Surrey County Council and GBC.

1. Appraisal and Local Plan

GBC has included Policy ID2 ‘Supporting the Department for Transport’s Road Investment Strategy’ within the Local Plan and text within the Transport Topic Paper between paragraphs 5.33 and 5.57. With regard to the current status of the RIS schemes see our comments on Policy ID2 above.

Paragraph 5.89 notes that “in the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the SRN is likely to be an important ongoing consideration as the existing SRN suffers from significant congestion during peak periods. Highways England’s main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety”.

Paragraph 5.90 notes that “the delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport’s RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN’s links and junctions where current congestion issues are the most acute”.

As noted above, it would be helpful to understand in detail which developments are expected to come forward ahead of a potential A3 scheme and which sites are dependent upon a scheme. This is required to allow critical management and phasing of the Local Plan developments to take place.

SUSTAINABILITY APPRAISAL

Highways England has no comments on the Sustainability Appraisal, as the broad transport conclusions remain unchanged.

Attached documents:
I strongly object to the Guildford Borough Council Local Plan.

The document includes a number of objectives:

- Preservation of the AONB and Green Belt
- Sustainable Development
- Development predicated on Infrastructure Improvement
- Provision of Affordable Housing

**Attached documents:**

---

**Comment ID:** pslp17q/656  **Respondent:** 16209409 / Natural England (Amy Steel)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** ()

Habitats Regulations Assessment

Having read through the updated document to take into account chapter 12, Natural England supports the overall conclusions of the assessment and can advise that the evidence used, particularly relating to Air Pollution is entirely appropriate.

We have however had a conversation with Guildford Borough Council during this consultation period to discuss the readability of certain sections within the document. Natural England expects Guildford Borough Council to amend these sections before submission to the inspector which we would be happy to provide further comments on. Despite this, it is important to note that this will not alter the overall conclusions of the assessment which as stated above we are supportive of.

Please see attached Annex A for our advice.

**Attached documents:**

- 217709_Guildford_Local_Plan_Strategy_and_Sites.pdf (175 KB)

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**Comment ID:** pslp17q/3  **Respondent:** 17100705 / Sylvia Evans  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

Given three forecasts as cited in Guildford Borough Land Availability Assessment(LAA) Feb.2016 of the new local plan, has sufficient focus been given to their overall impact on its efficacy? eg Patterns of Retail, Leisure Spend a) p101, 9.7 *That capacity forecasts beyond 5 years should be treated with caution*(and growth in the internet is one factor given)b) p102, 9.11 *Notwithstanding Guildford's positive performance as noted increased competition from other major centres*(eg Kingston) as well as, again, online shopping competition is cause for concern and c) p105, 9.27 *The impact of large retail development, eg North Street circa 47,500m squared on footfall and trade patterns across the town centre is another troubling factor.* (And I cite here Tunsgate development in the High Street)
In Appendix B, Realistic Candidates for development of the LAA (February 2016), 178, Guildford Park Car Park (160 houses) is up for development but according to the June 2017 Addendum, this has now been deleted.

In p6, Policy E7 Guildford Town Centre of the summary of key changes to the proposed submission Local Plan: Strategy & Sites (2017) it is stated 'Deletion of the Vision which came from the Town Centre Masterplan.' Does this mean the River Wey as a whole is no longer to be developed? If not, it is not clear what are the plans (if any) for this large area.

Attached documents:

Comment ID: pslp17q/9  Respondent: 17130497 / Ripley Court School (Andrew Gough)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()

The evidence base for this consultation is vastly complicated. One has to assume that it is all relevant and legal although this is far from clear. However, I cannot see how air quality and road traffic movement can improve with these huge changes to the green belt in this area.

For example, paragraph 1.1.5 excludes car access to facilities or the impact on public transport. Although this is included in the overall transport strategy, little assessment seems to have been made of the massive traffic delays on the A3 in recent years due entirely to weight of traffic. Access to the A3 and motorway network by the owners of another 400+ houses, assorted travellers and industrial traffic can hardly improve this. The Topic paper on transport speaks fine words about effective and safe travel, but seems more of an attempt to justify a huge increase in traffic and noise and air pollution which simply would not happen without these incursions into the green belt.

Attached documents:

Comment ID: pslp17q/123  Respondent: 17256513 / Guildford Environmental Forum (Adrian Thompson)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (Yes)

1. The Sustainability Appraisal (June 2017). This document seems to us to be adequate, up-to-date and relevant.

2. The Environmental Sustainability and Climate Change Study (updated 19.06.2017), although in many ways a very useful summary, it is somewhat out of date. We note that this Study contains very little new data since 2014 and that much of the evidence (see pages 43 to 46) dates back to 2007 to 2010. It refers on page 12 in clause 3.17 to new technical standards that will be introduced (ie in the future) in 2015. We do, however, agree with the substance of the Executive Summary of the report (even though based on evidence that may well be much more serious if it were based on more recent data):

   • Guildford Borough has higher carbon emissions than any other Surrey Borough (para 4.15 on p.18), mainly as a result of high road transport emissions.
   • Guildford Borough's carbon emissions in respect of household energy consumption exceed even those of Scotland, where the climate is much cooler (para 4.33) on p 22.
   • Small scale renewable energy production is lower in Guildford Borough than other parts of the UK (clause 4.42 on page 24).
   • Our water consumption is very high compared to England and Wales, while availability is low (clause 4.46 on page 25).
The potential for extreme climate change, and the possibility that change may come quickly, as the 2020s projections show, means Guildford will need to make plans for adaptation to begin in this plan period (Clause 5.13 on p. 29).

3. Surrey State of Nature Report. This valuable 32 page document has been produced by Surrey Wildlife Trust on behalf of the Surrey Nature Partnership in 2017. We have found no reference to it in the Local Plan 2017, but we believe that the update on biodiversity that it contains, should be taken account of in the 2017 Local Plan. In its conclusion it states that “We are entering a new phase and scale of development to deliver housing and related infrastructure across the county. Our resources will be stretched ever tighter to ensure these proceed as sustainably as possible, by incurring no further losses to Surrey’s biodiversity but instead offering opportunities that result in a genuine net gain”. GEF would recommend that pages 24 and 25 of this Report, which discuss the importance of “Natural Capital”, should be incorporated by GBC in the Guildford Local Plan. We note that the Surrey Nature Partnership plan to produce a “Natural Capital Investment Plan” in 2017 and would recommend that GBC consider this seriously in implementing the Guildford Local Plan.

Attached documents:

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Comment ID: pslp17q/47  Respondent: 17276289 / Tom Newton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)

1. I am concerned that despite an increase in traffic on the A3100 Burpham slip road of 15% since 2013 (per DoT Traffic count information) no consideration has been made of identifying a baseline air quality in the corner of land bounded by the A3 and the A3100 slip road. There is one primary school in this area and intense residential housing in the area but no evidence that any air monitoring, or detailed modelling has or will be done there. There are currently stationary traffic jams every weekday morning and afternoon and now at the weekends, particularly when Aldi is busy, yet your own Air quality assessment states that there are no sensitive receptors along the London road which is used to justify that ‘- Section 5.2.1 of the report:

"On London Road, where the largest changes in flows are anticipated, there are no air quality sensitive receptors located along the road, therefore significant adverse effects on air quality are not anticipated."

How can there be no sensitive receptors along the A3100 coming away into Guildford form the A3 - there are homes next to the road?

In terms of evidence this is significant flaw in accuracy and therefore conclusions with regard to air quality impacts in this area.

2. Further to this the in the Strategic Highway Assessment Report paras 4.7.7, 4.7.8 and 4.11.4 the traffic impact assessment of differing scenarios - Do nothing through to Scenario 5 show that there will be significant problems at the A3100/B2234 roundabout under all scenarios which is then not addressed anywhere - implies the main route for new residents at the Gosden Hill strategic site travelling into Guildford, existing residents, anyone coming onto Guildford southbound along the A3 and those coming into Burpham to use the proposed new southbound A3 on-slip will be stuck at that roundabout, exacerbating existing issues already prevalent there on a daily basis.

So evidence is available to show that problems with traffic will occur in the Burpham area but there is no attempt to mitigate this and no discussion of potential air quality impacts.

Attached documents:

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Comment ID: pslp17q/50  Respondent: 17281601 / Pirooz Karbasian  Agent: 

Document: Proposal Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: (No)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer: ()

We object your plan for the following reasons:

- In view of flawed new evidence, Guildford's proposal for more than 12426 homes (plus a buffer of 1155 homes) is excessive and will result in needless loss of green belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.
- There is evidence Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.
- Allocating more land for development in 2017 plan will also result in Guildford being required to provide homes for Woking on our green belt.

Attached documents:

Comment ID: pslp17q/75  Respondent: 17298785 / Ian Annis  Agent:

Answer: ()

NO. There is still a gross over-estimate on the number of housing units required in the region and double the historical rate of about 350 units per year built in the area. The only minor revisions section 3.1 and S2 still shows 654 units per year or 12,426 homes and double the amount actually required in the community.

The number of units of 12,426 also contradicts badly the estimated growth of people expected in section 2.3 showing an additional 20,000 residents in the time frame, which then means an average occupancy of 1.6 - that is not what is reflected in the plans for the type of development and property sizes which are more likely to have 2 to 4 occupants per housing unit.

The exaggerated housing requirement and low occupancy rate given in your own evidence clearly shows this is a massive over-estimate on the actual number and size of developments required in this area let alone any regard to the transport infrastructure already at crisis point along the A3 and through Guildford on a regular basis.

The number of housing units must still be massively revised downwards or justification regarding the actual number of people and occupancy rate and size of units expected as these currently do not justify the size and scale of new development in the plan.

Attached documents:

Comment ID: pslp17q/158  Respondent: 17320801 / Terence O'Rourke Ltd for M&G Real Estate (Andrew Elliott)  Agent: Terence O'Rourke for M&G Real Estate (Andrew Elliott)

Answer: (Yes)

The recent additions to the evidence base are welcomed and help to demonstrate that the Local Plan evidence base is up to date.
Of particular interest to M&G is the **Guildford Retail and Leisure Study Addendum, February 2017**. This confirms that Guildford town centre accounts for most of the Borough’s forecast need for comparison goods floorspace. This reflects the centre’s strong market share of comparison goods expenditure and strength of the comparison retail offer.

Nevertheless the forecast capacity results set out in the study addendum are lower than those identified for the town centre in the 2014 retail and leisure study update covering a similar period. The identified reasons for this include lower forecasted expenditure growth Borough-wide.

The report confirms that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution. This is principally due to the impact of economic, demographic and market trends on the key assumptions and forecasts. As a result the report authors, Carter Jonas, advise that greater weight should be placed on the short-term forecasts carried out over a three-five year period in accordance with National Planning Practice Guidance (NPPG). **M&G supports these comparison goods forecasts and findings and the appropriately emphasised caution on their use over a long time period.**

The study update also considers forecast need for new commercial leisure provision, focusing on cinema, food and beverage, and fitness and leisure provision. Opportunities for additional cinema screens (new/ expanded cinema facility in Guildford town centre) is identified together with potential to support new food and beverage floorspace with demand likely to be focused on Guildford town centre. The leisure assessment also identifies the potential need for two branded gym facilities based on projected population and current participation rates in this leisure activity, again with demand likely to be focused on Guildford town centre. **M&G supports these commercial leisure provision findings.**

The content of the Borough Council’s **Retail and Town Centres Topic Paper, 2017** is also of particular interest to M&G. The topic paper correctly identifies at paragraph 4.30 that the methodology for forecasting floorspace needs used in the retail and leisure study and addendum is based on a standard constant market share approach, which does not take into account any potential uplift in market shares and capacity (quantitative need) that could occur due to the ‘claw back’ of expenditure from competing centres to new retail floorspace in town centre locations, for example the new anchor store as part of the proposed North Street scheme.

At 4.39 the topic paper correctly summarises that the evidence underpinning the retail study points towards strong indicated signs of interest in Guildford town centre from food and beverage operators, which has been reflected in an adjustment to the capacity of the allocation for the North Street site A6 in the Local Plan, from 3,000 to 6,000 sq m (approx.) food and drink (A3) uses and drinking establishment (A4) uses between the 2016 and 2017 versions of the Submission Local Plan.

At 5.6 and 5.7 the topic paper identifies from the retail and leisure study addendum that forecasted comparison retail growth requirements have reduced and taking into account the revised need figures and a “reconsideration of the capacity and suitability of the North Street redevelopment site for comparison retail and other uses” the proposed retail floorspace capacity is reduced for A6 North Street from 45,000 sq m gross to 41,000 sq m gross. M&G comments further on this in its representation response to Policy A6.

At paragraph 6.1 the topic paper refers to providing an increased residential element to the allocated North Street regeneration site of up to 400 homes (C3 use) in response to comments raised on the 2016 Submission Local Plan, but also implies that additional capacity for residential is partly in exchange for reduced comparison retail floorspace (given updated forecasts of comparison retail need in the retail and leisure study). M&G comments further on this in its representation response to Policy A6.

**Attached documents:**

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<th>Respondent: 17323265 / Simon Owen</th>
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<tr>
<td>Document:</td>
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The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

Attached documents:

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**Comment ID:** pslp17q/196  **Respondent:** 17341057 / Sustainable Land Products Limited (Owen Davies)  **Agent:** Roger Daniels

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** ()

The accompanying report (*Tangley Place Concept Statement*) points to shortcomings in the Green Belt & Countryside Study as the basis for reviewing Green Belt boundaries and identifying appropriate allocations to meet the objectively-assessed need for housing throughout the plan period.

In particular, the Green Belt review does not comply with the requirements of paragraphs 84 and 85 of the National Planning Policy Framework, as it does not give sufficient weight to the need to promote sustainable patterns of development or reflect long-term development requirements.

In addition, the Land Availability Assessment is not based on a consistent rate of housing delivery that reflects housing requirements. It shows a shortfall in housing land supply throughout much of the plan period, including the absence of a five-year supply of housing land on adoption of the plan.

**Attached documents:** 📄 BRS.5853_12 C Design Vision 230617.compressed (1).pdf (15.3 MB)

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**Comment ID:** pslp17q/212  **Respondent:** 17343361 / Zurich Assurance Limited  **Agent:** Barton Willmore LLP (Gary Stevens)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

**Answer:** (Yes)

Refer to attached documents for comments on the following evidence base documents:

- Strategic Housing Market Assessment
- Employment Land Needs Assessment
• Flood Risk Sequential Test

Comment ID: pslp17q/318  
Respondent:  17415009 / Lightwood Strategic (Lightwood Strategic)  
Agent:  Roger Daniels

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer:  (No)

The accompanying report by Lightwood Strategic points to shortcomings in the approach to housing land supply which is not consistent with the objective assessment of housing requirements in the Strategic Housing Market Assessment. It also points to shortcomings in the Green Belt & Countryside Study as the basis for reviewing Green Belt boundaries and identifying appropriate allocations to meet the objectively-assessed need for housing throughout the plan period.

In particular, the Land Availability Assessment (June 2017 Addendum) is not based on a consistent rate of housing delivery that reflects housing requirements. It shows a shortfall in housing land supply throughout much of the plan period, including the absence of a five-year supply of housing land on adoption of the plan.

In addition, the Green Belt review does not comply with the requirements of paragraphs 84 and 85 of the National Planning Policy Framework, as it does not give sufficient weight to the need to promote sustainable patterns of development or reflect long-term development requirements.

Attached documents:

Comment ID: pslp17q/484  
Respondent:  17464577 / John Patterson  
Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Answer:  ()

I am dismayed that the revised Local Plan 2017 has not heeded the objections and concerns of residents that were sent to the 2016 Local Plan!

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

I suggest that you take a drive around the Guildford bypass and the A3/M25 junction on a Monday morning then ask yourself just how many more homes (and therefore cars!) the area can take

Attached documents:

Comment ID: SQLP16/1417  
Respondent:  17969537 / N Giles Ltd (Sir or Madam)  
Agent:  Vail Williams LLP (Jane Terry)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Answer:  ()

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

I suggest that you take a drive around the Guildford bypass and the A3/M25 junction on a Monday morning then ask yourself just how many more homes (and therefore cars!) the area can take

Attached documents:
**Answer:** (No)

The Green Belt and Countryside Study;
Infrastructure Delivery Plan;
Settlement Hierarchy

**Attached documents:**
- Location Plan - Beech Lane Flexford - 2016 07 15.pdf (83 KB)
- RepForm - GBC Proposed Local Plan Submission - Beech Lane - 2016 07.pdf (539 KB)

Total records: 538.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Question 2 - Legal Compliance
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Question 2 (2016): Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant?

Question 2 (2017): With regard to the proposed changes to the plan, do you consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole is legally compliant?

Comment ID: SQLP16/2060  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

GRA Comment: The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

Green Belt

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation, notwithstanding that this is the time when any boundary review deemed necessary takes place. Any such review should be mindful of the “great importance”, “openness” and “permanence” of Green Belt and take a long term perspective towards this planning mechanism.

The Mayor of London intends to respect London’s Green Belt boundary.

The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure (eg “support delivery of A3 junction upgrades” or “facilitate delivery of new strategic infrastructure including a rail station, park and ride and a secondary school”) or to fully meet exaggerated need does not pass this test. Nor does building on open, previously-developed Green Belt.

Opportunities to channel development towards locations beyond the outer Green Belt boundary, linked to sustainable transport and the duty to cooperate, have not been adequately considered at a strategic level. This assessment should involve more than just looking at a small area of countryside within the borough immediately beyond the Green Belt boundary, or indeed the rather meaningless Housing Market Area.

In view of the extent of the Area of Outstanding Natural Beauty, Special Protection Area and Green Belt in Guildford Borough, which restrict the availability of land suitable for development, it is important that the potential for sustainable travel is considered. This needs to be balanced against the option of minimising distances between work and home which is usually treated as a more sustainable approach.

It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review without considering the bigger picture is not sustainable. Proposed erosion of Green Belt to development and “insetting” in this Plan should be put in the context of cumulative loss. Since the Metropolitan Green Belt was established, just over 6% has been lost (6.24%), noting that a modest proportion of Green Belt lost to “insetting” will be protected as open space in villages.
If there is a case for Green Belt development, this would need to have been proven through the application of policy. In addition, careful thought would need to be given to the pace at which Green Belt is developed using a long term reserve site approach. It would be unsustainable to release all potential last resort greenfield options within one plan period, denying future generations any such options.

The Green Belt and Countryside Topic Paper refers to the issue of Green Belt safeguarded for development. It suggests in paragraphs 4.64 to 4.71 that the Plan will not safeguard sites for future development because so little land can be identified and more strategic solutions will be required. It concludes that any further Green Belt development would result in ribbon development, a stretched urban area and merging of villages with the urban area*. In view of the fact that such ribbon development would be wholly unacceptable, the more strategic approach referred to in paragraph 4.70 is required now. The current Local Plan review should both constrain the overall scale of development in this Plan and also very carefully pace any releases deemed necessary over several generations.

*4.68 “Given the limited central ribbon within which development could potentially occur, safeguarded land in Guildford would result in an unsustainable pattern of development. It would create an oblong-shaped urban area…”

4.69 “there will inevitably be a limit to the extent that Guildford urban area can expand before it would begin to merge with surrounding villages. This would have a detrimental impact on the character of the countryside and our rural communities.”

4.70 “…a more strategic approach to growth or protection will need to be considered, in cooperation with our neighbours.”

Sustainability Appraisal

The extent to which the current Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report

- accepts the Council’s corporate objectives, which have not gone through proper consultation, as consistent with sustainable development when this has not been tested,
- treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”,
- fails to consider options that constrain development or that make greater use of brownfield or previously-released greenfield land,
- focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect countryside around Woking
- does not consider environmental limits or impact on the next generation in terms of weighing demand for homes alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we do not consider it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective.
Notwithstanding that the Sustainability Appraisal should be proportionate, realistic, strategic, and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

We note that the Government’s Local Plans Expert Group has advised (March 2016) that “Whilst we recommend significant reductions in other elements of the local plan evidence base…, we propose that a proportionate Assessment of Environmental Capacity should be an important part of plan making.” The group confirms that “Objectively assessed needs for all types of development are the starting point but it is then necessary for the authority to consider the extent to which the plan can meet those needs consistently with the policies of the Framework.” They continue, “Despite the clear test set by paragraph 14 of the NPPF, few authorities compile an assessment of the environmental capacity of their area, making it difficult for Planning Inspectors to apply the NPPF policy”. They go on to say “We recognise that the NPPF does not require authorities to meet the full identified need for development in all circumstances, even within the Housing Market Area, if there is insufficient environmental capacity but we encountered significant uncertainty about how the appropriate balance should be struck. We make recommendations to remove that uncertainty and to confirm the legitimacy of applying the tests set out in the NPPF to ensure that needs are met up to the point where the adverse effects of doing so can be shown to outweigh the benefit of meeting the need.”

An adequate Sustainability Appraisal, which considers environmental capacity alongside social and economic aspects of sustainable development, should enable reasonable alternative scenarios to be tested against environmental capacity. We suggest the alternative scenarios selected in the current Appraisal, ranging from fully meeting exaggerated need to also meeting all of Woking’s need that would be unmet due to the application of constraints, did not test a meaningful spectrum of options. Indeed, it seems bizarre to place such emphasis on developing Green Belt in Guildford to protect countryside in Woking.

The Expert Panel was concerned at the number of authorities that cannot demonstrate soundness because they have constrained development without adequately testing the point at which adverse effects of meeting need can be shown to outweigh the benefit of doing so. The concern is that Guildford has gone the other way: it has been so eager to get the Plan through that it has failed to give sufficient weight to harm to the environment from fully meeting need, such that it proposes an inadequately tested option that would constitute unsustainable development.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2022</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td>Answer: ()</td>
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The Guildford Society recognises that Guildford Borough Council has taken legal advice in preparing the Local Plan, whereas we and other charitable bodies do not have access to such advice.

The Society expects there to be a legal challenge from some groups in the Borough who object to the removal of land from the Green Belt.

Whilst we regret the need to remove some areas from the Green Belt, we have taken the view in our previous submissions and in our submission in response to this Regulation 19 Consultation, that we will support the notion (noting our concerns about the reliability of the SHMA) that we will need to use some Green Belt land in this plan period to meet our housing need and to allow the time to properly regenerate our urban brownfield sites.

We do not propose to comment on legal compliance for itself, but rather to make the judgement that IF the plan is legally compliant, we wish to ensure it is the best it can be.

Attached documents:
| Comment ID: pslp17q/511 | Respondent: 8561377 / The Guildford Society (Julian Lyon) | Agent: |
|------------------------|----------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance |
| Answer: () |

We have not engaged any legal advisors and, as such, are not in a position to determine that legality of the plan. We are concerned about the nature of gamble being undertaken to make all or most development ‘contingent’ upon infrastructure, much of which is beyond the power and control of the Council to bring forward. We have commented on this at many of the individual policies, the evidence base and and also in a section entitled ‘Issues and Topic Papers’

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/319</th>
<th>Respondent: 8562209 / C J Cooper</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: ()</td>
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</table>

I object as I do not consider the removal of green belt areas is legal.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/993</th>
<th>Respondent: 8562273 / The Clandon Society (Christopher Dean)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<td></td>
</tr>
<tr>
<td>Answer: ()</td>
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</tbody>
</table>

24B. Question 2: Legal Compliance. This is surely a matter for qualified people. We are quite unable to judge whether the Proposed Submission Local Plan as a whole is legally compliant. Doubtless the Inspector and the legal representatives of parties to the hearing will decide this.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/967</th>
<th>Respondent: 8565185 / Mr Dave Robins</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: ()</td>
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</tbody>
</table>

I OBJECT TO the last minute inclusion of new sites in the Local Plan with not enough time for a proper consultation period

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/397</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent: Fiona Curtis</th>
</tr>
</thead>
</table>
The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are **48.728 with high's of 68 using National bias adjustment**.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

Attached documents:  
Air Quality correspondence.pdf (408 KB)

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**Comment ID:** SQLP16/1286  
**Respondent:** 8573793 / Harry Eve  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I am not a member of the legal profession so I can only give a lay opinion. Regulation 19 submission seems inappropriate in view of the state of the evidence and highly significant changes made since the previous consultation

Attached documents:

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**Comment ID:** pslp17q/307  
**Respondent:** 8573793 / Harry Eve  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

**Answer:** (No)
I am not a member of the legal profession but I consider that much of the proposed plan should fail under legal challenge.

The consultation for the 2016 draft local plan was poorly executed. When the comments were published many of mine were missing (later found under a different name whose own comments had been excluded). I answered “Yes” to the question concerning interest in participation at the examination. This was recorded as “No”.

When I raised these points the errors were gradually corrected but, the last time I checked, there were still issues with the way in which some of my comments had been recorded with words left out or incomplete.

It is not clear how many errors exist for other respondents but the majority may not have checked that their views have been recorded correctly.

There has been a lack of transparency, lack of scrutiny, and failure to act on errors pointed out by residents and consultees. The GBC Executive has undermined confidence in local democracy and the planning system.

The housing number is overstated, constraints have not been applied, and various parts of the evidence are unsound. I do not consider the plan to be justified.

The plan will create major problems in the future without solving local social housing needs or achieving affordability for those who currently live and work in the Borough. The continued use of appeals as a monitoring indicator will encourage the Planning Committee to allow applications rather than run the risk of losing an appeal. This is a particular concern given the recent changes to the structure of the Planning Committee.

In my opinion the plan goes against national policy in failing to apply (or even to recognise) constraints with regard to Green Belt and infrastructure.

I reserve my right to participate at the examination.

Attached documents:

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Comment ID: SQLP16/962  Respondent: 8575585 / Ian Macpherson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

Question 2

Legal Compliance

No Comment

Attached documents:

---

Comment ID: SQLP16/158  Respondent: 8579905 / John Baylis  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (Yes)

Yes, but there are some risks. See my letter to the Surrey Advertiser of 10.6.16 attached below.
Except I think it is not attached. I have sent a message to your help facility.

Attached documents:  Surrey Ad Plan letter_1.docx (14 KB)  
Surrey Ad Plan letter.docx (14 KB)

Comment ID: SQLP16/2  Respondent: 8581729 / Jeffrey Gargan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance 
Answer: (Yes) 

The plan for Burnt Common and Send has been changed at the last moment. These are significant changes which would require another full consultation under regulation 18, not Regulation 19 as proposed.

Attached documents:

Comment ID: SQLP16/1437  Respondent: 8582017 / The Clandon Society (J Wright)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance 
Answer: (No) 

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/1593  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance 
Answer: () 

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.
Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

---

**Comment ID:** SQLP16/1339  **Respondent:** 8593537 / Normandy Parish Council (Leslie GA Clarke)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

Normandy Parish Council strongly objects to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites ("Local Plan") and in particular to the allocation of land south of Normandy and north of Flexford for substantial development.

**In principle objection to development of this site**

The Parish Council opposes the principle of the development of this site:

1. The site lies within the Green Belt, and has been assessed by Guildford Borough Council (GBC) as having high sensitivity in Green Belt terms, serving to check the southward sprawl of Normandy and northward sprawl of Flexford, preventing the merger of those settlements, and safeguarding the countryside from encroachment (see Green Belt Purposes Assessment, April 2014). Accordingly, given the very significant contribution made by the site to the Green Belt in this area, it should not be developed.

2. The development of the site would not amount to sustainable development within the meaning of the National Planning Policy Framework. GBC’s claim that the approach would be sustainable fails to attach any or any meaningful weight to the environmental aspects of sustainability.

3. The proposed allocation has not been the subject of any proper assessment of highways impacts. The local road network is incapable of coping with the proposed scale of development and there is no evidence that the necessary highways improvements are feasible or deliverable within the plan period.

4. The site lies within 1 km of the Thames Basin Heaths Special Protection Area and accordingly requires substantial provision of alternative green space as an avoidance strategy. Preferable sites for development elsewhere could be delivered without such provision.

The development of this site would significantly affect Normandy and the surrounding area and has not been justified in the Local Plan or in the supporting documents. In addition to the principled objections to the development set out above, the Parish Council considers that there have been substantial flaws in the plan-making process to date which go to both the merits and legality of the Local Plan.

**Specific criticisms of the plan making process**

A sound plan must be based on proper evidence and consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives (see Environmental Assessment of Plans and Programmes Regulations 2004/1633 and e.g. Calverlon PC v Nottingham City Council [2015J EWHC 1078 (Admin), per Jay J at (67)].
The history of the Local Plan is known to GBC. The Parish Council wishes to emphasise that in the 2014 plan, it was not proposed that this site be allocated for development. Since then, there has been no further Green Belt review, but there has been a Green Belt Purposes Assessment which identified this site as particularly sensitive in Green Belt terms.

There is no explanation in the published documents of the "exceptional circumstances" (NPPF, 80) that are said to justify release of the site from the Green Belt. The Green Belt Capacity Study does not explain why such exceptional circumstances exist, and nor does the Sustainability Appraisal ("SA"). Extraordinarily, the SA states that the development of the site is regarded as a "given" (6.3.16). The SA acknowledges (in footnote 68, p 131) the greater impacts on the Green Belt in developing sites such as this, but does not explain why such development is nonetheless justified on both environmental grounds and by reference to the exceptional circumstances test.

The SA is open to further criticism through its failure to accord any weight to the Green Belt in analysing various options. This is a significant deficiency which renders the SA unsound and indeed unlawful, since the alternatives are not subjected to proper analysis on environmental grounds.

Further, GBC has consulted on the Local Plan with the proviso that this site should be deleted from the plan should it be demonstrated the provision of a secondary school on the site is not required. However, there has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the "exceptional circumstances" test. GBC's assessment of alternative secondary school sites notes that Surrey County Council's concerns as to remoteness of the site from development are as was only overcome by the new housing provision in the Local Plan i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

The Leader of GBC has suggested that the proposed houses should be regarded as "enabling development". The Parish Council submits that school funding should be achieved through the normal channels and not through the release of Green Belt land to housing development. This suggested cross-subsidy is an unjustified claim (there has been no viability analysis) and in any event is not a proper planning reason for allocating the site for development. The Local Plan is therefore unsound.

Next Steps

GBC's consultation on the Local Plan was based on the proviso that policy A46 was to be deleted in the absence of justification for the location of a secondary school at the site.

The Parish Council has seen no proper justification for the location of a secondary school in this Green Belt site. The selection of the site appears to have been justified on the basis that it will be close to the housing identified in the allocation. This makes for an entirely circular argument; the housing is only put forward on the basis of the school, and the school on the basis of the housing.

This cannot amount to an exceptional circumstance for the release of land from the Green Belt. There has been no adequate sequential site assessment for a new secondary school.

In those circumstances, GBC is invited to confirm that policy A46 will be deleted from the Local Plan because the school location has not been justified. The Spatial Strategy should be amended accordingly.
We await GBC's urgent confirmation that the Local Plan will not be proceeding with Policy A46 and that the land in question will remain within the Green Belt.

Attached documents: LP2016-Normandy-L Clarke- Parish.pdf (642 KB)

Comment ID: SQLP16/2009  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)  Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

We have no comment to make.

Attached documents:


Answer: (No)

Downsedge RA notes that the methodology and models used by G L Hearn to calculate the Objectively Assessed Housing Need (OAHN) for Guildford has not been made available to the public, so that others can check it. This OAHN figure is a key input into the calculation of the number of new homes required in the Borough going forward. In order to be legally compliant, we understand that the “Sustainability Appraisal, a tool for appraising the plan to ensure it reflects social, environmental and economic factors, should be made public”. Although a Sustainability Appraisal has been produced and made public, critically it does not contain, the method by which the OAHN has been calculated from the population forecasts.

Attached documents:

Comment ID: SQLP16/1035  Respondent: 8604321 / Barton Willmore (Simon Potts)  Agent: Associate Vail Williams (Chris Wilmhurst)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (Yes)

N/A

Attached documents:

Comment ID: SQLP16/1494  Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not
had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

Attached documents:

**Comment ID:** SQLP16/167  **Respondent:** 8640353 / Julian Cranwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I do not believe it is legally compliant. The council promised to listen to the objectors, who submitted 20,000 objections to the previous draft, and virtually nothing has changed.

In addition the NPPF clearly sets out the requirement for the OAN calculation to be 'replicable by others'. This is clearly not the case, as the council does not possess the model, and has not been able to verify the workings.

Further, the OAN modelling was outsourced to a sub-contractor, which is precluded in the contract to the main consultant.

Attached documents:

**Comment ID:** SQLP16/1311  **Respondent:** 8640353 / Julian Cranwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

Key parts of the evidence are missing, flawed or based on withheld assumptions. We consider therefore that it is questionable as to whether the Local Plan meets all legal requirements. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan. The Plan preparation process has had inadequate regard for national policy which attaches "great importance" to the "openness" and "permanence" of Green Belt. The test of "exceptional circumstances" that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement. It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of "exceptional circumstances" that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:
As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be reassessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/325  Respondent: 8687041 / Michael Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: (No)

With reference to Site A46 I OBJECT to the fact that in the Section 18 consultation this site was not indicated for development as part of this Local Plan. I therefore do not believe it is legally compliant that it features as such in this Section 19 consultation. Furthermore the Council has not demonstrated that there are "exceptional circumstances" that would justify removing this land from the Green Belt; it has been claimed that it is an "enabling development" to allow the construction of a secondary school but there is no legal basis for this. I therefore OBJECT to the inclusion of this site as part of the Local Plan.

Attached documents:

Comment ID: SQLP16/986  Respondent: 8703585 / N J Axten  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

The question implies that there s some doubt over the lagality of the local plan

Attached documents:

Comment ID: SQLP16/26  Respondent: 8707553 / Stuart Farquharson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

2. The local plan is a total fraud. GBC outsourced to a 3rd party company (which is not within the legality of plan) to estimate housing numbers required in each village. As a result not one resident can gain access to how these numbers were created due to them being commercially sensitive. Utter stupidity again. How can you expect residents to make an informed choice on what is right or wrong for the Borough and their villages when you hide behind this.

Attached documents:

Comment ID: pslp17q/461  Respondent: 8708545 / Nigel Wicks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance
Answer: (No)
I object to the proposed changes to the plan on the basis that they are not legally compliant since they are in conflict with the framework stipulation in paragraph 87 of the NPPF which states

“As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” (Policy P2, P3, E5).

It is relevant here that, according to the Guildford Green Belt Group, 70% of new housing will be in countryside and 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm).

The Plan does not provide evidence of the exceptional circumstances, which would justify this use of Green Belt land. Nor does the Plan justify the exclusion of further development in brown belt and urban areas sites. More such sites should be included to make the Plan legally compliant.

Attached documents:

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**Comment ID:** SQLP16/811  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:**

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

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Attached documents:

---

**Comment ID:** SQLP16/389  **Respondent:** 8717921 / Helen Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)
I do not believe that the plan is legally compliant and more likely it is morally bankrupt - for example there is no indication that Policy S1 has been limited by the Birds Directive.

Attached documents:

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**Comment ID:** SQLP16/676  **Respondent:** 8726529 / Eric Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites **as a whole** is legally compliant? Please provide the following information being as precise as possible:

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Attached documents:

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**Comment ID:** SQLP16/625  **Respondent:** 8729217 / Karen Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I do not consider that the Plan is legally compliant because huge areas have been taken out of green belt for development

- without any exceptional circumstances being put forward to justify this
- without any exceptional circumstances being put forward for a major road through the AONB or a major settlement in the setting to the AONB
- without proper constraints being applied (in terms of landscape designations or lack of infrastructure)
- without proper consideration of the viability of development schemes, especially from a highways point of view
- without proper use of the evidence base in the selection of sites

All of the above are necessary to make Guildford’s Local Plan legally compliant.
Comment ID: SQLP16/539  Respondent: 8729313 / Lisa Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (Yes)

No.

It has been developer lead.

GBC are too friendly with the University of Surrey. Uni heads are always in council, Uni staff are featured in GBC promotional video.

Local radio station, Eagle, has not published any news item related to the Local Plan in days. Question relationship between GBC leader and Eagle Director.

Attached documents:

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Comment ID: SQLP16/1029  Respondent: 8731649 / Ian Slater  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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Attached documents:
Comment ID: SQLP16/1011  Respondent: 8732321 / John Freeland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

I OBJECT because the consultation process has been flawed with false/exaggerated data and the council's own procedures have been short-circuited.

Attached documents:

Comment ID: SQLP16/1835  Respondent: 8732321 / John Freeland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

1. I OBJECT because the consultation process has been flawed with false/exaggerated data and the council's own procedures have been short-circuited

Attached documents:

Comment ID: SQLP16/1532  Respondent: 8735873 / David and Gillian Allan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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Attached documents:

Comment ID: SQLP16/1272  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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<th>Comment ID: SQLP16/1165</th>
<th>Respondent: 8749089 / Anthony Hatton</th>
<th>Agent:</th>
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<tbody>
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</table>

In our opinion the Submission Plan development process has taken insufficient account national policy which we believe stresses the importance of the “openness” and “permanence” of the Green Belt. While we fully understand and empathise with the need to provide development for more dwellings, nevertheless we believe that the criteria adopted for “exceptional circumstances” has not been given the required level of consideration at a strategic level.

We would question the suggestion that the Green Belt is being treated as permanent when as recently as 2003 boundary changes were included as part of the Local Plan Review.

It is our understanding that the National Policy Framework requires that objectively assessed needs should be met 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 “ etc. Our interpretation of this suggests that there are a number of items which are of particular relevance to Guildford particularly with regards to the eco system relating to birds and wildlife, areas of outstanding local beauty, heritage sites and those areas particularly venerable to flood risk. We would have thought that the Appraisal must include these factors.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/467</th>
<th>Respondent: 8749121 / George Paton</th>
<th>Agent:</th>
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<td>Answer: (Yes)</td>
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1. The Council's choice of certain strategic sites was determined several years ago. In the interval it has sought only to justify the choices it made then. This amounts to predetermination. The developer purchase pre-application advice. Over the course of the advisory period (several years) GBC succumbed to 'regulatory capture': [https://en.wikipedia.org/wiki/Regulatory_capture](https://en.wikipedia.org/wiki/Regulatory_capture).

2. Changing Green Belt boundaries prejudices the property rights of property owners whose property is 're-allocated'. Instead of addressing this serious issue in a professional and disinterested manner, GBC has acted to promote the interests of developers and shown complete disregard for anyone whose property rights have been prejudiced. This is evidenced by a complete failure to i) write to the property owners affected, explain the significance of the proposed changes and seek comment/opinion ii) set out the exceptional circumstances which justify the Green Belt changes iii) justify the new Green Belt boundaries. The local plan does not explicitly address these issues. Instead it merely refers readers to a large scale and rather inaccurate map.
3. Rather than put together the evidence in advance of public consultation and reach a properly documented conclusion GBC has gone ahead without gathering all the necessary information -such as a Transport Plan. It has left itself the opportunity of changing the local plan as new evidence comes in. That makes a mockery of the consultation.

4. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] This proposal appears to run contrary to established legal precedent eg the COPAS and Carpets of Worth cases.

Attached documents:

Comment ID: SQLP16/1458  
Respondent: 8749473 / Charlotte Beckett  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance  
Answer: (No)

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Attached documents:

Comment ID: SQLP16/71  
Respondent: 8766945 / Liz Machtynger  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance  
Answer: (No)

"the green belt should ONLY be altered in exceptional circumstances through the local plan process and with the SUPPORT of the local people" "Demand for housing alone will not change the green belt".

It is clear from all local feedback in previous polls that there is NO support for this (apart from with borough councillors).

I believe that sites have been selected randomly according to the population count likely to object (high green belt = low number of people).

I believe that the rejection of previous applications e.g. at Wisley and elsewhere in the country show that this enormous change to the Green Belt policy is one which would require the courts to decide.

Attached documents:
**Comment ID:** SQLP16/1484  **Respondent:** 8769793 / Laura Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

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**Attached documents:**

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**Comment ID:** SQLP16/853  **Respondent:** 8771233 / Ranald Mackinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

24.B. Question 2: Legal Compliance

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**Comment ID:** SQLP16/930  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

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Answer: ()

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Attached documents:

Comment ID: SQLP16/1881  Respondent: 8787969 / K Britton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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Comment ID: SQLP16/1829  Respondent: 8794753 / Andrew Beckett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()
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Attached documents:

Comment ID: SQLP16/1139  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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Comment ID: SQLP16/1512  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (No)

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<tr>
<th>Comment ID: SQLP16/1034</th>
<th>Respondent: 8803841 / Wellesley Theodore Wallace</th>
<th>Agent:</th>
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<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Part 6 of the Local Planning Regulations 2012 requires consultation and public participation. In R (Association of Municipal Authorities) v Secretary of State for Social Services [1986] 1 All E R 164 Mr Justice Webster said this at page 167,

"in any context the essence of consultation is the communication of a genuine invitation to give advice and a genuine consideration of that advice. In my view it must go without saying that to achieve consultation sufficient information must be supplied by the consulting party to the consulted party."

Although that was not a planning case, this was clearly statement of general principle which must apply here: Webster J cited the decision of the Court of Appeal Rollo v Minister of Town and Country Planning [1948] 1 All E R 13. In the present case in Local Plan is not legally compliant.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/385</th>
<th>Respondent: 8803841 / Wellesley Theodore Wallace</th>
<th>Agent:</th>
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<tbody>
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<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance</td>
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The questionnaire invites representations on the 'proposed changes' in the 2017 proposed plan, asking questions about the proposed changes 'as a whole'. It states 'comments must relate to proposed changes only'. The forward to the 2017 plan states that the consultation period 'offers another opportunity to have your views heard'. Cllr Spooner does not confine this to the latest changes. Many of the changes impact on policies and site allocations which are unchanged. The limitation in this consultation conflicts with NPPF para 155. Further, it is difficult to see how it could comply with the as yet unpublished statement of community involvement. It does not help that no consultation statement has yet been published on the responses to the 2016 draft plan. The restriction to changes is not legally compliant.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/461</th>
<th>Respondent: 8806849 / Roland McKinney</th>
<th>Agent:</th>
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No, I do not think the plan is legally compliant.

There is no adequate basis given for changing green belt boundaries, which although a complex issue is clear - there is a need for special special circumstances for each and every change and housing need alone is not an adequate basis for a green belt boundary change. In addition, there is a need for local support for boundary changes and this has not been tested. Many of the boundaries selected are weak and do not comply with the requirements of the NPPF. In at least one area, Effingham, residents have made clear their objection to boundary changes in surveys conducted by the Residents Association.

The draft Plan does not comply with Air Quality standards, there is no plan to introduce air quality management areas, despite some areas being outside legal limits. Under these circumstances there is a legal requirement to introduce an AQMA. This has not been done. There is also a lack of understanding regarding the need for an AQMA at Wisley. GBC maintain this is not needed as there are no residential properties close to the sensor. However, there is a need for an AQMA when the public have open access to the area, and this is the case. In fact, there are several people who are exposed to this pollution on a daily basis as they work in the cafe in the car park, almost directly opposite the sensor.
24.B. Question 2: Legal Compliance

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Attached documents:

Comment ID: SQLP16/344  Respondent: 8817185 / Irene Cope  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

I object to POLICY S2

Attached documents:

Comment ID: SQLP16/1820  Respondent: 8818625 / Beth and Frank Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

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Comment ID: SQLP16/1554  Respondent: 8820353 / Gillian Beaton  Agent:
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Answer: ()

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<td>8826369 / Tim Madge</td>
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<td>SQLP16/825</td>
<td>8827777 / Mary English</td>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

### Attached documents:
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

---

Comment ID: SQLP16/656  Respondent: 8827809 / Robert Wood  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

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Comment ID: SQLP16/1376  Respondent: 8828545 / Anjali Mittal  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

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Comment ID: SQLP16/1750  Respondent: 8836129 / Roger Shapley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: (No)
Response: NO

The plan focuses on growth and economic strategy, to the detriment of social equity and environmental protection as required by the NPPF.

Despite the DCLG encouraging ‘brownfield’ registers and ‘brownfield’ land release for housing, there is no ‘brownfield first’ policy. GBC is a major holder of ‘brownfield’ land in the town (Walnut Tree Close and Woddbridge Meadows) and yet has included none of these sites for housing development; Policy P4 is not a sound basis for such an exclusion.

The plan is inconsistent with the NPPF guidance, as 70% of house building is proposed in the Green Belt.

GBC has included no details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has failed expressly to include in Policy P1, H1 and P5 any direct consideration of NPPF para 119.

Attached documents:

Comment ID: SQLP16/1794   Respondent: 8839041 / Jon Maslin   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

I object

The Plan preparation process has had inadequate regard for national policy, which attaches ‘great importance’ to the ‘openness’ and ‘permanence’ of Green Belt. The test of ‘exceptional circumstances’ that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high's of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.
The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

Attached documents:

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**Comment ID:** SQLP16/1582  **Respondent:** 8840033 / Jimmy Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

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**Comment ID:** SQLP16/442  **Respondent:** 8843361 / Adrian Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

No the plan is not legally compliant

The plan is not balanced in line with the NPPF - focuses on economic development and growth at the expense of the other aspects such environmental protection. This reflects the fact that "green belt" or Greenbelt is only used twice in the GBC Corporate strategy doc. One was purely as a description of the borough "Almost all – 89% – of our borough is within the Metropolitan Green Belt, much of which is in productive agricultural use." Clearly the GBC have no intention to read the NPPF as a whole and read this policy as a whole, it is not in their published strategy to do so.


The plan is not balanced as a whole as per NPPF with 70% of housing being proposed in the Green Belt and not constraint applied with the housing target representing the full AON.

GBC has policy on failed to include in Policy P1, H1 and P5 any direct consideration of NPPF para 119.

I feel that the regulation 19 consultation is flawed as major changes have taken place since the last consultation - last consultation there was no joint SHMA, infrastructure and transport assessment.
I object as key parts of the evidence are missing, flawed or based on withheld assumptions. No the plan is not legally compliant. The plan is not balanced in line with the NPPF - focuses on economic development and growth at the expense of the other aspects such environmental protection. This reflects the boroughs un-mandated policy on green belt. “Green belt” or “Greenbelt” is only used twice in the GBC Corporate strategy document. One was purely as a description of the borough “Almost all – 89% – of our borough is within the Metropolitan Green Belt, much of which is in productive agricultural use.” Clearly the GBC have no intention to read the NPPF as a whole which is their legal obligation. It is not in their published strategy to do so. [http://www.guildford.gov.uk/media/15695/Corporate-Plan-2015-2020/pdf/5267_GBC_CorporatePlan_004_2015_-_2020.pdf](http://www.guildford.gov.uk/media/15695/Corporate-Plan-2015-2020/pdf/5267_GBC_CorporatePlan_004_2015_-_2020.pdf)

The plan is not balanced as a whole as per NPPF with 70% of housing being proposed in the Green Belt and no constraints applied with the housing target representing the full AON. GBC has policy on failed to include in Policy P1, H1 and P5 any direct consideration of NPPF para 119. I feel that the regulation 19 consultation is flawed as major changes have taken place since the last consultation - last consultation there was no joint SHMA, infrastructure and transport assessment. The Strategic Housing Market Assessment overstates need. Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan. The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that I question whether it complies with the requirement. It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy. On the 18/7/2016, in the House of Commons the Member of Parliament for Bromsgrove & Secretary of State for Communities & Local Government said:

Unless there are exceptional circumstances, we shouldn’t be carrying out any development in the Green Belt. The Green Belt is absolutely sacrosanct and that will not change.

Cllr Furniss, at the time in Dec 2014, leader for Infrastructure at GBC made it clear: “The news that this Guildford Borough Council Conservatives will not be supporting green belt development is to be welcomed by all. The Conservatives have always pledged to protect the green belt and we will continue to do so” That is as clear a statement as there can be as to the promise the Conservatives were giving at the time of the elections. He went on to say: “This change in direction by the DCLG allows us to reassess the Strategic Housing Land Availability Assessment (SHLAA) and Draft Local Plan against more constraints.” Yet the GBC have strategically decided to not apply any constraints and are proposing to opt for the full objectively assessed need as the target for the borough. When and who made that decision? It was not debated or discussed in council or really made public.
Much of the development, including areas updated in this revision, relies on SANG and SAMM, a mechanism dreamt up by Natural England and described in the Thames Basin Heaths Avoidance Strategy.

However, this mechanism has no evidence base behind it whatsoever, legal or otherwise.

I have now checked with Natural England twice (most recently 3rd July 2017), and there is still no evidence available. It therefore contravenes the Conservation of Habitats and Species Regulations 2010/EC Habitats Directive, the retained SE Plan Policy NRM6 viii (monitoring), NPPF paragraph 2

"Planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements", and NPPF paragraph 7 (which lays out the requirement for environmentally sustainable development).

The EC Habitats Directive, written into UK law, and further clarified by the Waddenzee judgement, places the onus on the “competent authority” to prove a plan will not adversely affect the integrity of the Thames Basin Heaths SPA, “i.e. where no reasonable scientific doubt remains as to the absence of such effects”. Since neither Guildford Borough Council nor Natural England have provided any scientific evidence, or indeed any evidence at all, it can only be concluded that this mechanism is not valid, and any plans relying on it unlawful.

Attached documents:

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Comment ID: SQLP16/364  Respondent: 8858017 / Adam Scott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (No)

too much is proposed in ash Parish without sufficient improvement to roads and schools

Attached documents:

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Comment ID: SQLP16/2036  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

I object as key parts of the evidence are missing, flawed or based on withheld assumptions. I consider therefore that it is questionable as to whether the Local Plan meets all legal requirements.

The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt.

The site at Blackwell Farm, Hogs Back for instance involves moving the greenbelt only 10-13 years after it was previously rolled back to allow Manor Farm to be developed by the University to create Manor Park. The test of
“exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 (ie Manor Farm up to Blackwell Farm) as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

Attached documents:

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<th>Comment ID: SQLP16/1321</th>
<th>Respondent: 8858881 / Stephen Meredith</th>
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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan upon which it is claimed to be based. The 2014 consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Despite these responses, the 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp17q/515</th>
<th>Respondent: 8865377 / Angus McIntosh</th>
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Following my letter of 11 July 2016, pasted below, I see very few amendments, which reflect my comments. There should be far more, looking at:

It would appear the Local Plan ignores the NPPF Paragraph 155.

There have NOT been meaningful engagements with local expert community groups. The Guildford Society, Guildford Vision Group, the Guildford Residents Associations and many more have attempted to have a meaningful, and helpful dialogues with GBC, but have been constantly thwarted. The worst of these was a councillor saying " these organisations
do not represent Guildford...”. Disgraceful.

Many members of these groups are far better qualified, with many years of national and international experience with urban development, such as Economist, Architects, Chartered Surveyors, Town Planners or Highway Engineers, than members of GBC. So why has their expertise been ignored? They ALL together with GBC want to plan & build a better Guildford.

Attached documents:

Comment ID: SQLP16/1380  Respondent: 8865537 / P Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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Attached documents:

Comment ID: SQLP16/1392  Respondent: 8881537 / Jean Baptist  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:
### Comment ID: SQLP16/1267  Respondent: 8892737 / David Eagle  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

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### Comment ID: SQLP16/1872  Respondent: 8893057 / Dianne Garnett  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

1.1 Key parts of the evidence are missing, flawed or based on withheld assumptions.

1.2 The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

1.3 The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

1.4 The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

1.5 It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt land for infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

**Attached documents:**

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### Comment ID: SQLP16/1433  Respondent: 8896097 / Andrew Fordham  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

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Attached documents:

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Comment ID: SQLP16/1174  Respondent: 8899713 / Tessa Crago  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

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Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

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Comment ID: SQLP16/756  Respondent: 8901633 / Duncan Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

20.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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Question 2: No the proposed submission Local Plan strategy and sites as a whole is not legally compliant. Where is the brownfield policy and does GBC hold a register, a mandate of The Housing and Planning Act 2016? 70% of house building is in Greenbelt, so clearly does not follow the NPPF. Not all the evidence was ready before The Plan was passed at full council so there was no time for councillors to scrutinise the missing documents, worryingly the Infrastructure Report which impacts on all the ‘strategic sites’. The majority vote pushed The Plan to the next stage of the process. It was clear councillors were not happy with this decision raising genuine concerns in an attempt to protect the residents who elected them.

NPPF 119 has not been taken into consideration by Planning Policy.

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/1561</th>
<th>Respondent: 8919009 / Andrew Kukielka</th>
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That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

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**Comment ID:** SQLP16/1559  **Respondent:** 8921857 / Claire Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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**Comment ID:** SQLP16/803  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.
That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: pslp17q/110  Respondent: 8933537 / Annie Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: pslp17q/452  Respondent: 8948385 / Gillian Eve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Answer: (No)

Question 2: Legal Compliance

Answer: No

Comment: I have no confidence in the legality of the Plan or the consultation process.

- Within my family, many of the comments made in the last consultation were omitted from the published comments, or recorded under someone else’s name, and it took a long time for corrections to be made. It is likely that many people did not check their comments on the published comments so who knows how many other errors were made.
- I spent time making comments on the on-line response form, only to find that these had disappeared when I logged in again – hence this response by letter. Other people may have given up.
- Insufficient consideration has been given to the results of the previous consultation.
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Please refer to the separate responses in question 6 / appendix 1.

We consider that the Draft Plan does not fully accord with the National Planning Policy Framework (NPPF) and is therefore not legally compliant at the present time. Whilst these issues are set out below in the detailed responses to draft policies, we summarise here why the draft plan is not fully in accordance with the NPPF.

The NPPF (paragraph 14) sets out the Government’s view of what sustainable development means in practice for both plan-making and decision taking at the local level. For plan-making the Framework states 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; either when assessed against the policies in the NPPF taken as a whole, or where specific policies indicate development should be restricted.

The NPPF (paragraph 17) also sets out 12 core planning principles that underpin both plan-making and decision-taking. Amongst other objectives these principles confirm that planning should be:
• plan-led;
• proactively drive and support sustainable economic development to deliver thriving local places;
• promote mixed use developments;
• focus significant development in locations which are or can be made sustainable; and
• deliver sufficient community and cultural facilities and services to meet local needs.

The NPPF is clear that pursuing sustainable development requires “…careful attention to viability and costs in plan-making and decision-taking” (paragraph 173). Plans should be deliverable and, in this context, sites and the scale of development identified in the plan should “…not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened” (paragraph 173).

In relation to the vitality of town centres, the NPPF at paragraph 23 states that planning policies should be positive and promote competitive town centre environments. When preparing Local Plans, some of the key principles that LPAs are advised to follow include:

• recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
• promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
• allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres;
• ensure that the needs for retail, leisure, office and other main town centre uses are “met in full” and “not compromised by limited site availability”;
• recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.

The draft allocation for the North Street site (Policy A6) and associated policies as presently worded fail to fully optimise the redevelopment potential of this major previously developed site within the town centre. This is Guildford’s largest brownfield site within the town centre and the only opportunity to meet its retail needs in the most sustainable location. As presently worded, the Draft Plan does not adequately provide for a sufficient quantum of key uses such as food and drink, leisure and residential which are vital ingredients to a successful flagship retail-led mixed use scheme in terms of vitality and viability.

2.10 Clarification is also necessary in relation to the Council’s proposals for new bus facilities as re-provision of the existing bus station on site would render the scheme unviable. Previous consented schemes have proved to be unviable primarily because of the Council’s historic insistence on providing a replacement bus station on site. As set out in our detailed response to policies S1, S2, H1, E2, E3, E6, E7, D1, I1, I2, I3 and A6, the Council has not fully recognised the potential to provide for enhanced retail and high density residential development of an appropriate scale and massing on this key town centre site.

2.11 As such the draft policies as written do not sufficiently or proactively drive sustainable economic development at this town centre site, contrary to the core planning principles (para.17) of the NPPF. This is also contrary to paragraph 23 of the NPPF which requires that town centre sites provide customer choice and a diverse retail offer, and are recognised as the heart of the community.

2.12 The allocation of the North Street site for only 200 homes and 3,000 sq m of food and drink does not recognise the development potential of the site to provide a high density mixed use scheme. This is not in accordance with the core planning principles of the NPPF (para.17) which sets out that planning should promote mixed use developments and encourage multiple benefits from the use of land.

2.13 More detailed comments regarding each of the above points are set out in our responses to specific policies within the Draft Plan.
I judge that the Submission Plan preparation process has not adequately taken account of national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. To my mind the test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. If there is a case for Green Belt development, it needs to be proven through the application of policy and careful thought would need to be given to the pace at which Green Belt is developed bearing in mind future uncertainties in economic and social development. It would surely not be sustainable to release all potential greenfield options within one plan period, and thereby deny future generations, faced with revised circumstances, any such options.

The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, I cannot see that it is appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective.
First of all I would like to object to the council’s use of 'Section 19'. The scale of the opposition to the last plan, from the people whose views they were elected to represent, makes it pretty clear that the plan needed a radical rethink, and not just the modest adjustments permitted under section 19. The use of section 19 also has the effect of stifling debate, and indeed many people are not at all clear what they are allowed to say at this point. Inevitably there will be considerably less comments than last time, and I hope the council will not try and misrepresent this as a sign that voters are any more happy with the plan.

I would like to object strongly to the changes to the draft local plan. It was good to hear that the inspector will see our responses to the last plan, as this one remains substantially the same, despite the public outcry. This leads many people to think that the so-called ‘consultation’ was pretty much a sham, and that the council has largely gone ahead and done what it wanted to do in the first place.

Since the last consultation, there have been a couple of important developments, which were not in the public domain then, and hence we were unable to comment on them.

The first is that the housing minister has recently, on BBC radio 4's 'Today' program, defined the 'exceptional circumstances' that would justify building on the Green Belt, none of which apply to Guildford. They are:

1. That all existing planning permissions have been built out. This does not apply to Guildford, as the university was given planning permission, in 2003, to build 4,790 student and staff units on Manor Park, and, according to the UoS website in April this year, it had only completed 1,637 units.
2. That there is no possibility of more intense development within existing town boundaries. This does not apply to Guildford, as there are some 17 hectares of ground level parking, land which could be used far more efficiently.
3. That there are no brown field sites available. This does not apply to Guildford either, as there are brown field sites at Slyfield, Walnut tree Close, Woodbridge Meadows, Shalford, and elsewhere.

These exceptional circumstances apply to any Green Belt land. Presumably the circumstances that would justify building on AGLV, and AONB, as at Blackwell farm, would have to be considerately more exceptional.

So I object to changes to the local plan on the grounds that it is in contravention of clearly expressed government policy on the Green Belt.

Attached documents:
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Attached documents:

Comment ID: SQLP16/195  Respondent: 9040673 / Anne Pearse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()
I object, A44 proposal was added after regulation 18 and has not been consulted on

Attached documents:

Comment ID: SQLP16/197  Respondent: 9040673 / Anne Pearse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()
I object, GBC have continually changed the plan and most recently by adding A44 without consultation.

Attached documents:

Comment ID: SQLP16/1074  Respondent: 9094753 / D Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/436  Respondent: 9293121 / Charlotte Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: (No)
As I understand it, the main aims of green belt land are:

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

I feel that the plan completely disregards all five purposes set out by the government’s National Planning Policy Framework. Whilst I understand there are exceptional circumstances that would make developing green belt land viable, having read both the policy framework and GBC’s Green Belt & Countryside Study, I cannot feel there is enough evidence to make this such an exceptional circumstance to justify potentially destroying an area of outstanding natural beauty. Where does it stop? Green belt is meant to be green belt permanently, which is why on the other side of the coin, 'New Green Belts should only be established in exceptional circumstances'.

Attached documents:

**Comment ID:** SQLP16/807  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:**

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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**Attached documents:**

**Comment ID:** SQLP16/1505  **Respondent:** 10619169 / Wendy Critchlow  **Agent:**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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Attached documents:

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I object to Policy S1. Sustainability should include the Green Belt as an absolute constraint I object to Policy S2.

I object to the proposed housing figure for the Local Plan to build 13,652 homes at 693 DPA for next 20 years (2013-2033). The housing figure for this plan is unsustainable and the plan does not apply constraints. Local infrastructure will not cope. Paragraph 4.1.12 of the proposed submission Local Plan acknowledges that the number of houses is greater than required.

Representations made on behalf of Send Parish Council by Tibbalds Planning and Urban Design consultants illustrate how allocations are made to provide 910 Dwellings Per Annum (DPA) or 131% of the requirement of the SHMA.

According to NPPF guidance Paragraph 47 stipulates that planning authorities should provide for an additional buffer of between 5-20% and based on this advise the figure would be in region of 727-832 DPA. The provision in the GBC Local Plan to build 910 DPA is therefore excessive.

Without applying constraints the housing figure could rise even higher than 13,652 houses when windfall sites are taken into consideration.

I object to building 485 homes in Send Parish. The scale of development for Send lacks all sense of proportionality. For example Thame in South Oxfordshire has population of approximately 11,000 and a site for 800 was proposed by the Council. Send has a population of approximately 4000 and GBC has allocated 485 houses be built. The population increase will lead to congestion on roads, pressure on local schools, the Villages medical centre and hospital facilities.

I strongly object to Policy H1 Homes for all.

During the 2014 consultation I referenced a report by John Peny (2012) "UK migrants and the private rented sector" for the Joseph Rowntree Foundation. The report noted that taking account of ONS 2011 census data, 75% of migrants who came to the UK in the past five years reside in the private rented sector.
Demographics of the private rented sector (including Houses of Multiple Occupation -HMOs) are an important factor when producing a strategic plan to provide appropriate housing rather than continued reliance on the private rented sector. The plan contains no mechanism to address this or reducing reliance on the private rented sector. Instead GBC has recommends “monitoring” the number of houses of multiple occupation through the number of planning applications. However monitoring will be ineffective when planning permission is not required to change from a C3 (small dwelling house) to C4 (small house of multiple occupation of up to five unrelated individuals). GBC cannot therefore be able to determine the true extend of HMOs and the private rented sector.

However the numbers of those living in the private rented sector inflate the overall housing figure upwards while this plan fails to address the necessity tenure mix of new built dwellings required for this section of population “need” as opposed to building housing on volume. Infact the plan recommends continued use of the private rented sector as a tenure mix and affordability solution. If this recommendation is in addition to the total number of new houses proposed by the plan, then the net effect is to significantly increase population in Guildford, not to address affordability or pressure on existing housing stock that the private rented sector contributes too. Failure to tackle the private rented sector will in turn further inflate housing market prices and leads to more issues of affordability in the longer term. Research published by the Bow Group titled “Solving the Uk Housing Crisis” (November 2015) by Daniel Rossall Valentine, underlines these issues further. It is demand rather than need that is fuelling OAN figures upwards and this plan fails significantly to address this.

I strongly object to Policy H1 Affordable Homes or that this Local Plan addresses building affordable housing for local need. Current guidance on producing SHMA’s Jacks a meaningful needs-based definition of affordability - such as for example the proportion of income allocated to housing costs. OAN figures alone therefore cannot tackle affordability or need (defined as a basic human need to have a roof over our head). I believe that a more meaningful approach to addressing local need is through Neighbourhood Plans and local land trusts. They provide a mechanism to meet local need while preserving and enhancing villages characters. We need local planning that works with local communities. The bottom up approach of Neighbourhood Plans rather than the top down approach of SHMA with an OAN figure incompatible with genuine affordability is a more realistic approach to addressing local need.

Moreover, a recent Rural Housing Needs Survey commissioned by Send Parish Council in 2013 found that “local need” was relatively low within Send Parish.

I object to Policy P2 Green Bell

I object to removing/ insetting villages from the Green Belt for the following reasons:

1) NPPF guidance makes clear that Green Belt boundaries should only be altered in exceptional circumstances through the Local Plan process. Unmet housing need is unlikely to outweigh harm to the Green Belt and consililuate “exceptional circumstances”.

1. Send Village should remain in the Green Bell The village of Send with its proximity on the border of Woking is a village which fulfils paragraph &O of the NPPF which stipulates that Green Bell is Lo check unrestricted sprawl of large built-up areas and to prevent neighbouring towns from merging. Paragraphs 79-&6 of the NPPF should therefore be applied to Send as a constraint and Send should not be removed from the Green Belt.

   • Moreover the basis for Policy P2 is the Guildford Borough Green Belt and Countryside Study.

3a) Guildford Borough Green Belt and Countryside Study has Jacked consistency to Green Belt boundaries. Land in Send Parish which was initially identified as Green Belt within the evidence base document, Guildford Borough Green Belt and Countryside Study - Volume IV (2014) has now been allocated for housing development as sites A43 and A44.
3b) Elsewhere Guildford Borough Green Belt and Countryside Study is used to rule out other sites which meet the GBC Flood Risk Sequential and Exception Test (May 2016), See Appendix I Stag 1, 2 and 3 page 25. Again there is a lack of consistency in approach.

- The Settlement Hierarchy is another key evidenced based document for Policy P2 which is IL makes a subjective decision that Send Marsh and Burnt Common are categorised as a large village due to their proximity to Send services. In practise this is a small convenience store attached to a garage/fuel station. Had this not been so Send Marsh and Burnt Common would have been classified a medium village. Medium villages are unsuitable for substantial growth (such as site A43 Garlick’s Arch). Please refer further to ‘Representations on behalf of Send Parish Council by Tibbalds Planning and Urban Design consultants).

I also object to Policy D4 Development in Urban Areas and Inset Villages for all the reasons above.

Attached documents:

**Comment ID:** SQLP16/1095  **Respondent:** 10750945 / Lorna Crispin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

We do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

**Comment ID:** SQLP16/1446  **Respondent:** 10765249 / Andy & Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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**Attached documents:**

**Comment ID:** SQLP16/1496  **Respondent:** 10769121 / Ali Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

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** Attached documents:**

**Comment ID:** SQLP16/1608  **Respondent:** 10773441 / Barry Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

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**Attached documents:**

**Comment ID:** SQLP16/1710  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

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Attached documents:
The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement. It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1986</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
<th>Agent:</th>
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<td><strong>Answer:</strong></td>
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The plan focuses on growth and economic strategy, to the detriment of social equity and environmental protection as required by the NPPF.

Despite the DCLG encouraging ‘brownfield’ registers and ‘brownfield’ land release for housing, there is no ‘brownfield first’ policy. GBC is a major holder of ‘brownfield’ land in the town (Walnut Tree Close and Woodbridge Meadows) and yet has included none of these sites for housing development; Policy P4 is not a sound basis for such an exclusion.

The plan is inconsistent with the NPPF guidance, as 70% of house building is proposed in the Green Belt.

GBC has included no details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has failed expressly to include in Policy P1, H1 and P5 any direct consideration of NPPF para 119.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/17</th>
<th>Respondent: 10799489 / Shai Sinai</th>
<th>Agent:</th>
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I object GBC have not followed correct process

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<table>
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<tr>
<th>Comment ID: SQLP16/959</th>
<th>Respondent: 10800673 / Nigel Rowland</th>
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</tr>
<tr>
<td><strong>Answer:</strong></td>
<td>(No)</td>
<td></td>
</tr>
</tbody>
</table>
• I OBJECT to GBC adding Garlick’s Arch to the plan at only 13 days before the 24th May discussion of the Local Plan by GBC. The fact that this was ‘last minute’ was admitted by Mr Spooner at the Send Parish Council Meeting on June 14th. This site presents a significant change to the regulation 18 consultation in 2014, and therefore should have been fully debated, rather than accepted through a shortcut of Regulation 19. The fact that GBC have been ‘gifted’ the land to build the slip road to the A3 (policy A43a) in return for the inclusion Garlick’s Arch leads to cynicism and doubt that due process is being followed.

• I OBJECT to the disregard that GBC have shown to the concerns of local residents through previous ‘consultation’ processes which suggests that this one will be no different. Since 2014 GBC have changed every major site in Send proposed for development and now want to add a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up to 485. This is in spite of a huge amount of effort by local residents to give the requested feedback to the previous plan. Naturally people are tired of repeating the same objections on seemingly deaf ears, but GBC should not conclude that the proposals have public support.

Attached documents:

Comment ID: SQLP16/1838  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

• I OBJECT to GBC adding Garlick’s Arch to the plan at only 13 days before the 24th May discussion of the Local Plan by GBC. The fact that this was ‘last minute’ was admitted by Mr Spooner at the Send Parish Council Meeting on June 14th. This site presents a significant change to the regulation 18 consultation in 2014, and therefore should have been fully debated, rather than accepted through a shortcut of Regulation 19. The fact that GBC have been ‘gifted’ the land to build the slip road to the A3 (policy A43a) in return for the inclusion Garlick’s Arch leads to cynicism and doubt that due process is being followed.

• I OBJECT to the disregard that GBC have shown to the concerns of local residents through previous ‘consultation’ processes which suggests that this one will be no different. Since 2014 GBC have changed every major site in Send proposed for development and now want to add a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up to 485. This is in spite of a huge amount of effort by local residents to give the requested feedback to the previous plan. Naturally people are tired of repeating the same objections on seemingly deaf ears, but GBC should not conclude that the proposals have public support.

Attached documents:

Comment ID: SQLP16/571  Respondent: 10802177 / roger harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (No)

Requirements to properly consult have been overridden; no consultation whatsoever has been possible, for example, in the last minute inclusion of the Burnt Common "Garlick’s Arch” estate. The duty to consider use of Green Belt land only in exceptional circumstances has not been met. No assessment has been made of the impact on water, sewerage, power, transport by road and rail, schooling, medical facilities, footpaths and road safety, all of which would be severely affected adversely.

Attached documents:

Comment ID: SQLP16/1045  Respondent: 10808833 / David Brandon  Agent: Vail Williams (Suzanne Holloway)
Comment ID: SQLP16/1371  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (Yes)

N/A

Attached documents: final rep wellington house July 2016 (3).docx (1.1 MB)

Comment ID: SQLP16/1444  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/67  Respondent: 10818241 / Vanessa Birchall-Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:
**Answer:** (Yes)

I object to the plans as, in addition to questionable evidence base it appears that the significance of the changes proposed has not been appropriately reflected in the process being followed. Full consultation should be followed as and not some kind of short cut process.

**Attached documents:**

---

**Comment ID:** SQLP16/379  **Respondent:** 10834081 / Stephen Vincent  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I doubt whether tis is legal after the resignation suddenly of the Head of Planning.

**Attached documents:**

---

**Comment ID:** SQLP16/63  **Respondent:** 10846241 / John Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I suspect the legality of GBC’s local plan when the Government and previously GBC itself have stated that there would be no development of greenfield sites.

**Attached documents:**

---

**Comment ID:** SQLP16/1673  **Respondent:** 10846625 / Frank Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

1.1 **I object** to this local plan on the grounds that key parts of the evidence are missing, flawed or based on withheld assumptions.

1.2 **I object** to this local plan on the grounds that i) the Strategic Housing Market Assessment overstates need, ii) that the Green Belt and Countryside Study uses a flawed approach and iii) that the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

1.3 **I object** to this local plan on the grounds that the Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” to justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

1.4 **I object** to this local plan on the grounds that the Sustainability Appraisal has lost sight of and is not compliant with the concept of Sustainable Development as described in the National Planning Policy Framework.

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1228</th>
<th>Respondent: 10857889 / William Kyte OBE</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
</tr>
<tr>
<td>Answer: ()</td>
<td>()</td>
<td>()</td>
</tr>
</tbody>
</table>

The Plan shows inadequate regard to national policy which attaches great importance to the openness and permanence of the Green Belt. The test of exceptional circumstances has not been rigorously demonstrated. The Sustainability Appraisal has not applied the concept of sustainable development.

The Plan has had such substantial changes since the last Regulation 18 consultation that it should be subjected to a further Regulation 18 consultation.

The Local Plan has been prepared against a predetermination by the GBC Executive to ‘roll back the Green Belt’ which has destroyed objectivity.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2117</th>
<th>Respondent: 10858977 / Angela Otterson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
</tr>
<tr>
<td>Answer: ()</td>
<td>()</td>
<td>()</td>
</tr>
</tbody>
</table>

Key parts of the evidence are missing, flawed or based on withheld assumptions.

The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1769</th>
<th>Respondent: 10859553 / MARK Curtis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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</table>

Question 2: Legal compliance
The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are **48.728 with high's of 68 using National bias adjustment**.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

**Attached documents:**

---

**Comment ID:** SLP16/77  **Respondent:** 10870305 / Rosalyn Vickery  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I object on the grounds that Send should not be removed form the green belt because it provides a needed buffer between Woking and Guildford. The land at Garlick's Arch contains Ancient Woodlands and should thus be permanent green belt.

**Attached documents:**

---

**Comment ID:** SLP16/1834  **Respondent:** 10880609 / S. Groves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

---
I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1592</th>
<th>Respondent: 10890177 / Cheryl Burnside</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td>Answer: ()</td>
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</tbody>
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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/939</th>
<th>Respondent: 10892353 / Robert Wilson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td>Answer: (Yes)</td>
</tr>
</tbody>
</table>

N/A

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/596</th>
<th>Respondent: 10915937 / Rona Lester</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td>Answer: (No)</td>
</tr>
</tbody>
</table>

I am not a lawyer but I understand that the council has to prove exceptional circumstances to take land out of the Green Belt regulations and I have not seen this demonstrated.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1009</th>
<th>Respondent: 10921921 / V Groves</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td>Answer: ()</td>
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</tbody>
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Answer: ()

I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

Comment ID: SQLP16/1833  Respondent: 10921921 / V Groves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

Comment ID: SQLP16/1239  Respondent: 10928737 / Guy Pashley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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Attached documents:

Comment ID: SQLP16/1269  Respondent: 10943457 / Henry Benzikie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

---

**Comment ID:** SQLP16/1270  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

---

**Comment ID:** pslp17q/84  **Respondent:** 10944513 / Amber Ellis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

**Answer:** (No)

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**Attached documents:**

---

**Comment ID:** SQLP16/661  **Respondent:** 10952705 / Moira Maidment  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:
I object

**Attached documents:**

| Comment ID: SQLP16/89  Respondent: 10957441 / Christopher Hunter  Agent: |
|------------------------|---------------------------------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance |
| **Answer:** (No) |

I object

**Attached documents:**

| Comment ID: SQLP16/1240  Respondent: 10959009 / Rebecca Claridge  Agent: |
|------------------------|---------------------------------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance |
| **Answer:** () |

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

| Comment ID: SQLP16/1670  Respondent: 10962785 / Derek Gilmore  Agent: |
|------------------------|---------------------------------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance |
| **Answer:** () |

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan on which it is claimed to be based.

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Comment ID:** SQLP16/1537  
**Respondent:** 10972065 / Sarah Cocke  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Comment ID:** SQLP16/1765  
**Respondent:** 10986657 / MC Nominees Ltd  
**Agent:** Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

**Comment ID:** SQLP16/1238  
**Respondent:** 10987905 / Marika Chandler  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/1188  Respondent: 10990145 / Anne Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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Attached documents:

Comment ID: SQLP16/1121  Respondent: 10992833 / Amanda Verny White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

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Attached documents:

---

**Comment ID:** SQLP16/1075  **Respondent:** 10997121 / Rob Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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Attached documents:

---

**Comment ID:** SQLP16/1328  **Respondent:** 10998081 / David Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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Attached documents:

---

**Comment ID:** SQLP16/968  **Respondent:** 11000385 / Sheila Robins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()
**I OBJECT TO** the last minute inclusion of new sites in the Local Plan with not enough time for a proper consultation period.

The proposed widening of the M25 will only increase the amount of vehicles being drawn to junction 10 on the A3. The proposed building developments will only worsen the current situation.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1852</th>
<th><strong>Respondent:</strong> 11000385 / Sheila Robins</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
</tr>
<tr>
<td><strong>Answer:</strong></td>
<td>()</td>
<td></td>
</tr>
</tbody>
</table>

**I OBJECT TO** the last minute inclusion of new sites in the Local Plan with not enough time for a proper consultation period.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1708</th>
<th><strong>Respondent:</strong> 11007393 / James Culmer</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
</tr>
<tr>
<td><strong>Answer:</strong></td>
<td>()</td>
<td></td>
</tr>
</tbody>
</table>

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/95</th>
<th><strong>Respondent:</strong> 11008033 / Sandra Reeves</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
</tr>
<tr>
<td><strong>Answer:</strong></td>
<td>(Yes)</td>
<td></td>
</tr>
</tbody>
</table>

I object in that Guildford BC has not followed the correct process having changed every major site in Send proposed for development since 2014, now adding in a major new road junction. The proposal for new houses has changed having done down in April 2016 to 185 and now being increased to 485. Significant changes require another full consultation under Regulation 18.

**Attached documents:**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

---

Overall, I object to the approach that the Council is taking to the consultation. During the re-drafting of the 2014 draft Local Plan, instead of finding a sensible alternative the Council has changed all the major sites in Send and added a large road junction. It is beyond belief that the Council suggest that they have listened to we, the residents, yet have actually increased the planned housing levels in the village. These changes are significant so require another full consultation under Regulation 18, not the short-cut of Regulation 19 which the Council is using.

Attached documents:

---

I Object because the proposed Send developments were never mentioned in the original local plan. This addition requires another full consultation under regulation 18.

Attached documents:

---

The plan fails to follow NPPF guidance regarding Brown Field sites.
The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

This is surely a matter for legally qualified people. I am unable to judge whether the Proposed Submission Local Plan as a whole is legally compliant. Doubtless the Inspector and the legal representatives of parties to the hearing will decide this.

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
* what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

**Comment ID:** SQLP16/1666  **Respondent:** 11044129 / Christopher Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

**Comment ID:** SQLP16/332  **Respondent:** 11045953 / Victoria Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I object to Send Village being removed from the Green Belt

**Attached documents:**

**Comment ID:** SQLP16/1217  **Respondent:** 11047201 / Peter McGowan  **Agent:**
Finally, I am concerned to read reports that there may be laws or regulations that may have been breached or may be breached as a result of the making or implementing of the above proposals. If in the unfortunate case that there are such breaches involved in these proposals then residents obviously also reserve their rights to pursue whatever legal remedies or actions that jointly or individually may be available to them.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/849</th>
<th>Respondent: 11047329 / Hazel Corstin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td><strong>Answer:</strong> ()</td>
<td><strong>Answer:</strong> ()</td>
</tr>
</tbody>
</table>

### 24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1538</th>
<th>Respondent: 11047873 / Mary Waldner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td><strong>Answer:</strong> (No)</td>
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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.
Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

---

**Comment ID:** SQLP16/1140  **Respondent:** 11049473 / Victor Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

---

**Comment ID:** SQLP16/1527  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**
Comment ID: pslp17q/138  Respondent: 11053825 / Claire Owen  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance  
Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/1462  Respondent: 11054049 / Clare Goodall  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance  
Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/1842  Respondent: 11070113 / Alison Hague  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance  
Answer: ()

Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/1471  Respondent: 11074465 / Louise Vaughan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/1018  Respondent: 11074561 / Tim Anderson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.
ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

Comment ID: SQLP16/1655  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high’s of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.
I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

Attached documents:

**Comment ID:** SQLP16/1755  **Respondent:** 11150913 / Sarah Marshall  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

**Comment ID:** SQLP16/960  **Respondent:** 11992097 / Karen Fryatt  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
**Answer:** ()

-the overly short consultation plan and the documents which is unreadable by those with poor eyesight (blue background with white text!!)

Attached documents:

**Comment ID:** SQLP16/1840  **Respondent:** 11992097 / Karen Fryatt  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
**Answer:** ()

the overly short consultation plan and the documents which is unreadable by those with poor eyesight (blue background with white text!!)

Attached documents:
### Question 2: Legal Compliance

**Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant?**

No.

We question whether the councils proposed Policy H1 “Homes for All” has full regard to National Policy and Guidance in relation to Custom and Self-build homes. The policy H1 makes no specific reference to Custom or Self-builds and there is limited detail in the reasoned justification under para 4.2.12 which focuses on keeping a Self-build Register and the allocation of some self-build plots within the strategic housing development sites. This is the duty imposed on local planning authorities set out in the Self-Build and Custom Housebuilding Act 2015. There is now also a duty placed on local planning authorities to grant planning permission for enough serviced plots of land to meet demand for self-build and custom house building arising in each base period. Regulations are yet to specify the detail and it is early days in terms of people becoming aware of, being interested in and taking up the opportunities of the provisions. Whilst some provision is made within the Plan within the strategic housing sites, there is no monitoring indicator for this type of housing, nor any reference to targets. In order to ensure that the duty to meet demand and to grant permission is adequately addressed, it is considered that further work needs to be made within the Plan through adding an indicator and target but also ensuring that adequate sites of suitable character are allocated.

**Attached documents:**

---

### Comment ID: SQLP16/1902  Respondent: 12316001 / Vail Williams LLP (Jane Terry)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

No.

We do not consider the Plan to be compliant with the national policy set out in the NPPF in relation to the provision of suitable and sufficient SANG as required by the Habitats Directive.

**Attached documents:**

---

### Comment ID: SQLP16/1975  Respondent: 13579713 / Roger Daniels  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (Yes)

Yes.

Sustainable Land PLC does not challenge the legal compliance of the Proposed Submission Local Plan.

**Attached documents:**

---

### Comment ID: SQLP16/578  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

---
We understand that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

Attached documents:

---

Comment ID: SQLP16/6  
**Respondent:** 15057889 / Katherine Pyne  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I Object. I do no agree with the underhand move to publish this plan with such short notice.

Attached documents:

---

Comment ID: SQLP16/1010  
**Respondent:** 15062625 / Stephen Groves  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:**()

I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

---

Comment ID: SQLP16/31  
**Respondent:** 15066369 / Adam Fairbairn  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

While this plan may be 'legally sound', what about the rights of all of the animals that have no legal side or entity which fights against the destruction of their homes? Putting all these buildings, homes and construction there will murder and eradicate many helpless animals that are only trying to fend for themselves in an already overpopulated area. I strongly object to these proposals for the good of not just the community, but for the wildlife community too. Of course, these plans will be conducted 'by the book' and will be legally sound but this is not the point then constructing houses and destroying habitat for the sake of unnecessary homes.

Attached documents:

---

Comment ID: SQLP16/37  
**Respondent:** 15067393 / Anthony Fairbairn  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I object because there have been significant changes to the document which require a full consultation under Regulation 18, not Regulation 19.
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/38</th>
<th>Respondent: 15067425 / Anita Fairbairn</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
</tr>
<tr>
<td>Answer:</td>
<td>(No)</td>
<td></td>
</tr>
<tr>
<td>I object to this plan. Significant changes to the plans for Send require a full consultation under Regulation 18, not Regulation 19.</td>
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<tr>
<td>Attached documents:</td>
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</tbody>
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<table>
<thead>
<tr>
<th>Comment ID: SQLP16/47</th>
<th>Respondent: 15081569 / Gary Cable</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
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<tr>
<td>Answer:</td>
<td>(No)</td>
<td></td>
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<tr>
<td>Again I believe the last minute changes to the local plan made by GBC means they have not followed correct process. I object to the significant changes made from April 2016 especially regarding the number of houses jumping from 185 to 485 as these should require another full consultation under regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with.</td>
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<tr>
<th>Comment ID: SQLP16/48</th>
<th>Respondent: 15081729 / Peter McCarthy</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
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<tr>
<td>Answer:</td>
<td>(Yes)</td>
<td></td>
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<tr>
<td>I object that this has complied with current legislation as GBC appears to be pushing these changes through on regulation 19 hence by passing another full consultation required under regulation 18</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/55</th>
<th>Respondent: 15081921 / Robert Neal</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
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<td></td>
</tr>
<tr>
<td>Answer:</td>
<td>(Yes)</td>
<td></td>
</tr>
<tr>
<td>I OBJECT as the GBC has made significant changes to the plan without full public consultation which is contrary to Regulation 18 which invalidates the planning process.</td>
<td></td>
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<tr>
<td>Attached documents:</td>
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<thead>
<tr>
<th>Comment ID: SQLP16/56</th>
<th>Respondent: 15082049 / Antony Marke</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
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</tbody>
</table>
Answer: ()

I object to GBC having not followed the correct Process for the planning. The way you have changed the development plan is significant and required another full consultation under Regulation 18.

Attached documents:

---

Comment ID: SQLP16/839  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

3. LEGAL COMPLIANCE

3.1 Key parts of the evidence are missing, flawed or based on withheld assumptions.

3.2 The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

3.3 The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

3.4 The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

3.5 It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

Attached documents:

---

Comment ID: SQLP16/80  Respondent: 15097697 / Lisa Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (No)

I object. Guildford Borough Council have not followed the correct process in relation to the number of houses to be built in Send. Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction at Burnt Common. These are significant changes and require another full consultation under Regulation 18.

Attached documents:

---

Comment ID: SQLP16/607  Respondent: 15098945 / ALISON TURNER  Agent:

Answer: ()

I object to GBC having not followed the correct Process for the planning. The way you have changed the development plan is significant and required another full consultation under Regulation 18.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/119</th>
<th>Respondent: 15108065 / Claire Cable</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
<td></td>
<td></td>
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<tr>
<td>The evidence is flawed and not factual</td>
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<td>Attached documents:</td>
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<thead>
<tr>
<th>Comment ID: SQLP16/132</th>
<th>Respondent: 15110177 / GORDON TURNER</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (Yes)</td>
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<tr>
<td>I object</td>
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<tr>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/135</th>
<th>Respondent: 15110721 / Stuart Reeves</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
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<tr>
<td>No I object as GBC have failed to provide sound evidence in terms of the employment land needs Assessment 2015</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/153</th>
<th>Respondent: 15120481 / Jonathan Barratt</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
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<tr>
<td>I object because GBC have not followed correct process the 2014 proposal for 430 houses went down in 2016 to 185 and has now gone up to 485. These significant changes require another full consultation under regulation 18</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/173</th>
<th>Respondent: 15135873 / Julie Andrews</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
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<tr>
<td>I object to building on the greenbelt area that is already crowded and stretched for facilities.</td>
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<td>Attached documents:</td>
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</table>
I object and do not consider this legally compliant because the proposed changes require a full consultation under regulation 18 and not the short cut 19.

Attached documents:

Comment ID: SQLP16/189  
**Respondent:** 15140289 / Francis Pearse  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I object, GBC have not followed the correct process. Since 2014 GBC has changed every major site in Send the proposed for development and now just added a massive new Road junction. The 2014 proposal for 430 houses went down in April 2016 to 285 And has just gone up again to 485. These significant changes required another full consultation and regulation 18, not the short cuts of regulation 19 which GBC are trying to get away with.

Attached documents:

Comment ID: SQLP16/226  
**Respondent:** 15146017 / Liam Walker  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

I object as it can not be legal to build on the greenbelt

Attached documents:

Comment ID: SQLP16/258  
**Respondent:** 15156609 / stewart Gibbons  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I would like to object to planned building of 700 homes per year, the area of Send does not have sufficient infrastructure to support this type of expansion. There are insufficient schools, road and transport system. Will destroy the village and its uniqueness, turn the whole are into a massive Conurbation.

The process which this has been proposed contravenes not only planning commitment and guidance as laid down by the government for green belt, but also has ignored due process.

I object to further development for the following reasons. With advent of the UK exit from the EU, the prediction for the requirement for housing and development of commercial units will need to be revised downwards. As the 3 million EU citizens currently in the UK, will be affected by this current event, and their ability to stay in this country will also be affected. So your estimates for further development of housing are wildly exaggerated and need to be revised downwards.

In addition to the potential down grade in the economy due to Brexit, your estimation for commercial and housing development is wildly exaggerated and unnecessary. Given you have allowed development of send marina; I really don’t understand how you can commit to further commercial developments. So therefore this development is folly this area does not need.
In particular, I want to object to all the following points:

I object to Garlicks Arch development of green belt land which contravenes government guide lines and that due process was not followed in the introduction of this development into this plan, and did not follow this process. Its inclusion in this plan was included at the last stage and did not follow process. So for that reason should be excluded.

I object to the council changing the enclosure of green belt land round the Ripley and Send villages, changing of village boundaries to allow for future development.

I object to the wholesale destruction of green belt land in this area (including development of 2000 homes at Gosden hill farm, Merrow, and also Send and Ripley), which contravenes directly the government stated commitment to preservation to green belt land.

I object to the creation of new north and South Bounds slips ways from the A3 to the A247 clandon Road (policy A243) at Burnt common, as in light of the wholly unnecessary due to planned expansion which unlikely be needed within the 10 years.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/263</th>
<th>Respondent: 15156673 / Emma France</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
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</table>

i object

I don’t believe that it is legal to build in all the areas planned.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/276</th>
<th>Respondent: 15180193 / Paul Bedworth</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<td>Answer: (Yes)</td>
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</table>

The changes in the latest plan are significant and therefore require full consultation under Regulation 18, NOT the Reg 19 currently being used and I understand that this invalidates the whole process.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/322</th>
<th>Respondent: 15182913 / Nicola Spurgeon</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
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</table>

I object because GBC has failed to provide sound evidence in terms of Employment Land Needs which shows an 80% reduction in employment space from the previous ELNA carried out. 50% of new houses could be built on brownfield sites instead of the Green Belt.
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/286</th>
<th>Respondent: 15199009 / Alan Toomey</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: ()</td>
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<tr>
<td>Build on green belt cannot be legal or right.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/490</th>
<th>Respondent: 15216129 / Timothy Hewlett</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (Yes)</td>
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<tr>
<td>To make this document legally compliant it should be scrapped and the people involved in its creation should be subject to a criminal investigation for corruption.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/310</th>
<th>Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (Yes)</td>
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<tr>
<td>Yes, it appears legally compliant</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/352</th>
<th>Respondent: 15241313 / Christine Relf</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: ()</td>
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<tr>
<td>I object to an ancient woodland being used (and is Green Belt land) as a new housing development</td>
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<tr>
<th>Comment ID: SQLP16/358</th>
<th>Respondent: 15241345 / Peter Relf</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: ()</td>
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<tr>
<td>I object to Green Belt fields and ancient woodland being used.</td>
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<tr>
<td>Comment ID: SQLP16/540</td>
<td>Respondent: 15244097 / Persimmon Homes (Craig Hatton)</td>
<td>Agent:</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
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For those reasons set out above we do not believe that the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant. We have set out suggested changes under question 3 below.

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/154</th>
<th>Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP</th>
<th>Agent: Pegasus Group (Mike Spurgeon)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance</td>
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<tr>
<td>Answer: (No)</td>
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Having reviewed the proposed changes to the document, there is no reason why the Proposed Submission Local Plan: strategy and sites (2017), is not legally compliant.

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/555</th>
<th>Respondent: 15266785 / Trenfold Property Limited and Countryside Properties Limited</th>
<th>Agent: Boyer (Michelle Thomson)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
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Please see report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited for further details.

<table>
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<tr>
<th>Comment ID: SQLP16/455</th>
<th>Respondent: 15273697 / Ray Briggs</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (Yes)</td>
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</table>

As the evidence base cannot be independantly reviewed this cannot be legally compliant.

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/483</th>
<th>Respondent: 15274561 / Thomas Davies</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<tr>
<td>Answer: (No)</td>
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</table>
The consultation does not include the impact of the A3 widening. A3 widening is required for the viability of the Blackwell Farm development and should be considered in conjunction.

Attached documents:

---

Comment ID: SQLP16/496  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: (No)

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

We object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high’s of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 1 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

We do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

Site A26 - Blackwell Farm - See Annex 4 attached.

Attached documents:  
Air Quality correspondence.pdf (408 KB)  
Independent Traffic report annex 3.pdf (2.5 MB)  
Site 26 BWF Annex 4.pdf (456 KB)
I object on the basis that the amount of properties Guildford Borough Council proposed was 185 and now gone to 485. Such a major difference requires a new consultation period under Regulation 18.

Attached documents:

Save in respect of Allocation A43 Garlick's Arch and A43a Land for new northfacing slip roads to/from A3 at Send Marsh/Burnt Common which has not been the subject of consultation prior to its allocation in the Plan.

Attached documents:

We are not convinced that the Proposed Submission as a whole is legally compliant, particularly with regard to the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. One of the requirements for the preparation stage of the Plan is to develop alternatives and options and appraising them through sustainability appraisal and against evidence. For the reasons we have set out in this Submission, we do not believe that the Council has (a) taken a meaningful approach to developing alternatives and options nor (b) assessed them against evidence, or applied a sustainability appraisal in a logical manner. This is contrary to paragraph 182 of the NPPF which makes clear that explicit consideration of alternatives is a key part of the plan making process.

This shortcoming is particularly concerning in light of the strong possibility of a number of the strategic allocations not being delivered (or delayed in coming forward), which would result in other sites being needed as an alternative. In particular, the removal of a number of safeguarded sites from this latest version of the Plan leads to concerns about the lack of any identified alternatives during the Plan period, many of which have been collectively dismissed on the Council’s internal assessment of high sensitivity. This would appear to be contrary to Regulation 12 (2) of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633.

We are also concerned that the Council has not demonstrated due regard for other strategies and relevant matters, including the local transport plan and transport facilities and services. It is evident from the shortcomings on infrastructure requirements, particularly in relation to the strategic sites, that the Council has not taken a joined up approach on these matters, which runs contrary to Section 19 (2), Regulation 10 of the Planning and Compulsory Purchase Act 2004 (as amended).

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Attached documents:

Comment ID: SQLP16/584  Respondent: 15282241 / Elena Papazoglou  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: (No)

The land was legally designated GreenBelt. To change this is unconstitutional and illegal. I object to any building on the greenbelt land

Attached documents:

Comment ID: SQLP16/613  Respondent: 15282593 / Anne Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: (No)

Does the SHMA fulfil requirements for legal compliance?

Attached documents:

Comment ID: SQLP16/1647  Respondent: 15299201 / Samira Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()
The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

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Attached documents:

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Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.
Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant. The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:
4. QUESTION 2: Legal Compliance

We do not feel sufficiently qualified to comment on whether the Local Plan is legally compliant.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/830</th>
<th>Respondent: 15370593 / A Gee</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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24.B. Question 2: Legal Compliance

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<th>Comment ID: SQLP16/845</th>
<th>Respondent: 15379969 / Teresa Britton</th>
<th>Agent:</th>
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**Attached documents:**
Comment ID: SQLP16/933  Respondent: 15400833 / William John Scott  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

A46. A47. A50.

This fails the national planning policy framework being a huge development which would completely destroy Normandy and Flexford rural structure. I object most strongly to these proposals. There has been no discussion with local people or their organisations.

Attached documents:

Comment ID: SQLP16/945  Respondent: 15405857 / Raymond Mackay  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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Comment ID: SQLP16/950  Respondent: 15406017 / Eleanor Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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Attached documents:

I also object to the fact that proposed sites in Send, including the Garlick’s Arch proposal, have been added as a last minute addition. They were not included in the 2014 consultation, Send has not been properly consulted and other proposed sites have been substantially changed. The development at Garlick’s Arch for 400 houses was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

Attached documents:

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**Attached documents:**

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**Comment ID:** SQLP16/1855  **Respondent:** 15422625 / Graham Burrows  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I object to insufficient consultation period, of 6 weeks to review a 1800 document

I object to the last minute inclusion of new sites with less than two weeks notice

**Attached documents:**

---

**Comment ID:** SQLP16/982  **Respondent:** 15425025 / Cornelius Johann Jeronimus  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I do not know the limits of the legal compliance requirements

**Attached documents:**

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**Comment ID:** SQLP16/997  **Respondent:** 15426305 / I C Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

Question 2: Legal Compliance. I have no legal training. Surely this is a matter for the Council’s own advisers and the Inspector?

**Attached documents:**

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**Comment ID:** SQLP16/1006  **Respondent:** 15427617 / Ken Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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**Attached documents:**

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**Comment ID:** SQLP16/1053  **Respondent:** 15439585 / Bryan Handcock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

The local roads are not suitable to cope with the amount of traffic hundreds of houses would generate.

**Attached documents:**

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**Comment ID:** SQLP16/1072  **Respondent:** 15442049 / Ellouise Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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### Comment ID: SQLP16/1073  **Respondent:** 15442081 / Lauren Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance  

**Answer:** ()

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### Comment ID: SQLP16/1090  **Respondent:** 15442913 / Inger Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance  

**Answer:** ()

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<th>Respondent: 15446273 / Jane Stevens</th>
<th>Agent:</th>
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<td>Answer: (Yes)</td>
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<tr>
<th>Comment ID: SQLP16/1118</th>
<th>Respondent: 15448321 / Nicole Mapplebeck</th>
<th>Agent:</th>
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GRA Comment: The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

Green Belt

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation, notwithstanding that this is the time when any boundary review deemed necessary takes place. Any such review should be mindful of the “great importance”, “openness” and “permanence” of Green Belt and take a long term perspective towards this planning mechanism.

The Mayor of London intends to respect London’s Green Belt boundary.

Releasing Green Belt to fund infrastructure (e.g. “support delivery of A3 junction upgrades” or “facilitate delivery of new strategic infrastructure including a rail station, park and ride and a secondary school”) or to fully meet exaggerated need does not pass this test. Nor does building on open, previously-developed Green Belt.

Opportunities to channel development towards locations beyond the outer Green Belt boundary, linked to sustainable transport and the duty to cooperate, have not been adequately considered at a strategic level. This assessment should involve more than just looking at a small area of countryside within the borough immediately beyond the Green Belt boundary, or indeed the rather meaningless Housing Market Area.

In view of the extent of the Area of Outstanding Natural Beauty, Special Protection Area and Green Belt in Guildford Borough, which restrict the availability of land suitable for development, it is important that the potential for sustainable travel is considered. This needs to be balanced against the option of minimising distances between work and home which is usually treated as a more sustainable approach.

It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review without considering the bigger picture is not sustainable. Proposed erosion of Green Belt to development and “inserting” in this Plan should be put in the context of cumulative loss. Since the Metropolitan Green Belt was established, just over 6% has been lost (6.24%), noting that a modest proportion of Green Belt lost to “inserting” will be protected as open space in villages.

If there is a case for Green Belt development, this would need to have been proven through the application of policy. In addition, careful thought would need to be given to the pace at which Green Belt is developed using a long term reserve site approach. It would be unsustainable to release all potential last resort greenfield options within one plan period, denying future generations any such options.

The Green Belt and Countryside Topic Paper is cause for concern on the issue of Green Belt safeguarded for development. It suggests in paragraphs 4.64 to 4.71 that the Plan will not safeguard sites for future development because so little land can be identified and more strategic solutions will be required. It concludes that any further Green Belt development would result in ribbon development, a stretched urban area and merging of villages with the urban area*. In view of the fact that such ribbon development would be wholly unacceptable, the more strategic approach referred to in paragraph 4.70 is required now. The current Local Plan review should both constrain the overall scale of development in this Plan and also very carefully pace any releases deemed necessary over several generations.
4.68 “Given the limited central ribbon within which development could potentially occur, safeguarded land in Guildford would result in an unsustainable pattern of development. It would create an oblong-shaped urban area...”

4.69 “there will inevitably be a limit to the extent that Guildford urban area can expand before it would begin to merge with surrounding villages. This would have a detrimental impact on the character of the countryside and our rural communities.”

4.70 “…a more strategic approach to growth or protection will need to be considered, in cooperation with our neighbours.”

**Sustainability Appraisal**

The extent to which the current Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report

- accepts the Council’s corporate objectives, which have not gone through proper consultation, as consistent with sustainable development when they are not,
- treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”,
- fails to consider options that constrain development or that make greater use of brownfield or previously-released greenfield land,
- focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect countryside around Woking
- does not consider environmental limits or impact on the next generation in terms of weighing demand for homes alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we do not consider it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective.

Notwithstanding that the Sustainability Appraisal should be proportionate, realistic, strategic, and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

We note that the Government’s Local Plans Expert Group has advised (March 2016) that “Whilst we recommend significant reductions in other elements of the local plan evidence base…, we propose that a proportionate Assessment of Environmental Capacity should be an important part of plan making.” The group confirms that “Objectively assessed needs for all types of development are the starting point but it is then necessary for the authority to consider the extent to which the plan can meet those needs consistently with the policies of the Framework.” They continue, “Despite the clear test set by paragraph 14 of the NPPF, few authorities compile an assessment of the environmental capacity of their area, making it difficult for Planning Inspectors to apply the NPPF policy”. They go on to say “We recognise that the NPPF does not require authorities to meet the full identified need for development in all circumstances, even within the Housing Market Area, if there is insufficient environmental capacity but we encountered significant uncertainty about how the appropriate balance should be struck. We make recommendations to remove that uncertainty and to confirm the
legitimacy of applying the tests set out in the NPPF to ensure that needs are met up to the point where the adverse effects of doing so can be shown to outweigh the benefit of meeting the need.”

An adequate Sustainability Appraisal, which considers environmental capacity alongside social and economic aspects of sustainable development, should enable reasonable alternative scenarios to be tested against environmental capacity. We suggest the alternative scenarios selected, ranging from fully meeting exaggerated need to also meeting all of Woking’s need that would be unmet due to the application of constraints, did not test a meaningful spectrum of options. Indeed, it seems bizarre to place such emphasis on developing Green Belt in Guildford to protect countryside in Woking.

The Expert Panel was concerned at the number of authorities that cannot demonstrate soundness because they have constrained development without adequately testing the point at which adverse effects of meeting need can be shown to outweigh the benefit of doing so. The concern is that Guildford has gone the other way: it has been so eager to get the Plan through that it has failed to give sufficient weight to harm to the environment from fully meeting need, such that it proposes an inadequately tested option that would constitute unsustainable development.

Attached documents:

Comment ID: SQLP16/1194  Respondent: 15464673 / Trudy Grey  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance  

Answer: ()

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**Comment ID:** SQLP16/1219  **Respondent:** 15474849 / Timothy Yorath  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land. Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

---

**Comment ID:** SQLP16/1237  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()
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Comment ID: SQLP16/1350  Respondent: 15502209 / Shirley Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

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Comment ID: SQLP16/1351  Respondent: 15502241 / Richard Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

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Comment ID: SQLP16/1330  Respondent: 15504001 / Margaret Banks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

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Comment ID: SQLP16/1711  Respondent: 15570817 / Tom Edelsten  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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Comment ID: SQLP16/1709  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Answer: ()

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I object that the Plan is not legally compliant in that the modelling assumptions and structure have not been made available and therefore the SHMA does not comply with the Town and County Planning (Local Planning) (England) Regulations.

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<th>Comment ID: SQLP16/1405</th>
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Question 2: Legal Compliance. This is surely a matter for legally qualified people. I am unable to judge whether the Proposed Submission Local Plan as a whole is legally compliant. Doubtless the Inspector and the legal representatives of parties to the hearing will decide this.

Attached documents:

<table>
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<th>Comment ID: SQLP16/1393</th>
<th>Respondent: 15571937 / S Bennell</th>
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<th>Comment ID: SQLP16/1426</th>
<th>Respondent: 15579457 / RSPB South East Office (Heather Richards)</th>
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<td>Answer: ()</td>
<td>No. The RSPB does not consider that the document is legally compliant. The plan can only be adopted if the Council is able, on the basis of all the evidence available, to conclude that the Plan will avoid an adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (or any other Special Protection Area (SPA) or Special Area of Conservation(SAC)), as required by The Conservation of Habitats and Species Regulations 2010 (as amended).</td>
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**Comment ID:** SQLP16/1501  **Respondent:** 15584961 / Helen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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**Comment ID:** SQLP16/1516  **Respondent:** 15585601 / Sophie Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (No)

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**Comment ID:** SQLP16/1522  **Respondent:** 15586017 / C Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
I object

The Plan preparation process has had inadequate regard for national policy, which attaches ‘great importance’ to the ‘openness’ and ‘permanence’ of Green Belt. The test of ‘exceptional circumstances’ that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high's of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

Comment ID: SQLP16/1553  Respondent: 15588929 / Alex Hutchings  Agent: Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

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Comment ID: SQLP16/1576  Respondent: 15590273 / Eunja Madge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()

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Comment ID: SQLP16/1636  Respondent: 15601057 / Chris Vinall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
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Comment ID: SQLP16/1656  Respondent: 15602177 / Julia Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()
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**Comment ID:** SQLP16/1677  **Respondent:** 15603489 / Simon Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

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Instead this 2016 draft Plan actually **increases** the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1689</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
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<tr>
<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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\textbf{Attached documents:}

\begin{verbatim}
Comment ID: SQLP16/1707  Respondent: 15612481 / Gillian Culmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()
I do not consider the Proposed Submission Local Plan: strategy and sites \textit{as a whole} to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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\textbf{Attached documents:}

Comment ID: SQLP16/1723  Respondent: 15615745 / Nicholas Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Answer: ()
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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

**Comment ID:** SQLP16/1731  **Respondent:** 15618305 / Lawrence Claridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**Attached documents:**

**Comment ID:** SQLP16/1730  **Respondent:** 15618337 / Matthew Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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**Attached documents:**
The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high’s of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

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<tr>
<td>SQLP16/1846</td>
<td>15650369 / Stephanie Dean</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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<td>I am not legally qualified and therefore feel that any opinion I express on this matter would be just that, opinion. I trust that this plan will be adequately reviewed by suitably legally qualified and objective people to decide on its legality.</td>
<td>Attached documents:</td>
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<td>SQLP16/1853</td>
<td>15653505 / Dave Robins</td>
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<tr>
<td>SQLP16/1892</td>
<td>15666113 / Barrat David Wilson Homes (Nick Keeley)</td>
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<td>SQLP16/1914</td>
<td>15670785 / Mr and Mrs Poulsom</td>
<td>Vail Williams LLP (Jane Terry)</td>
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<td>15679137 / Turley (Hannah Bowler)</td>
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</table>
Please see supporting report for more details

Attached documents:

**Comment ID:** SLP16/1968  **Respondent:** 15686913 / The Barn, Effingham (Adam Powell)  **Agent:** Andy Stallan (WYG)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** (Yes)

Insofar as it relates to 'The Barn, Effingham' site. Please refer to the accompanying separate representation submission report dated July 2016 for details.

**Attached documents:** [The Barn Effingham- Local Plan Reps (2).pdf](#) (426 KB)

**Comment ID:** SLP16/1993  **Respondent:** 15688481 / Sally Lescher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

The Plan preparation process has had inadequate regard for national policy, which attaches "great importance" to the "openness" and "permanence" of Green Belt. The test of "exceptional circumstances" that might justify allocating Green Belt land for the development in a Local Plan has not been rigorously and transparently applied at a strategic level.

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1. **Legal compliance and soundness**

I object to the proposed Local Plan on the grounds that numerous factors make it non-compliant legally and unsound.

The Local plan proposals for A46 and A47 are inadequate on all the following grounds:

- The NPPF demands that residents are actively engaged in deciding their needs and priorities. This has not been met. These previously safeguarded proposals have been brought forward in detail only in this iteration of the plan, meaning residents have had only a minimal time to respond and only in relation to Regulation 19, not at Regulation 18. Even at a public meeting on 24th February with Cllr Spooner the position presented was that the safeguarding on A46 had been lifted and that the site was a ‘red rated’ green belt area. No mention was made of either proposal – only a few weeks before the new draft was published. I understand the proposals have been with GBC for up to two years.

I object that residents have not been fully consulted on these proposals.

- The proposals are contrary to the NPPF’s requirements on biodiversity and the natural environment. In section 11 headed “Conserving and enhancing the natural environment”, it is stated that planning policy should protect and enhance valued landscapes and minimise impacts on biodiversity, providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species populations……”. GBC is failing to do this in several ways in relation to A46 and A47 with no clear justification or evidence given as to why this is the case. It seems that no consideration has been given to the value of the existing SNCIs, the wider network of hedges and trees and the fact that all this is within one of Surrey’s Biodiversity Opportunity Areas – despite Policy I4 seeking to promote exactly these qualities. I object that Guildford has not given biodiversity the full consideration legally required, in breach not only of these policies but their statutory duty under the NERC Act 2006.

- A46 and A47 both fall within the Green Belt, but their inclusion here is not justified. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF states ‘the essential characteristics of Green Belts are their openness and their permanence’ (NPPF). Past verdicts of planning inspectors have declared that Normandy/Flexford green fields (A46) contribute to the ‘openness’ of the Green Belt and a panoramic view of green fields to the Surrey Hills AONB.

Paragraph 4.3.1.2 of the Plan (under Policy P2) states that "only those villages whose open character makes an important contribution to the Green Belt should be included in the Green Belt". I contend that the land in both Policy A46 and A47 makes an unparalleled contribution to the Green Belt which stretches from Guildford in the east to Ash/Tongham in the west. If this area is inset and built upon in the manner proposed it will be the beginning of urban sprawl across this stretch of countryside which Green Belt policy was designed to prevent. The Government have indicated that Green Belt is supposed to be protected, but GBC are trying to justify development in this area when they themselves designated it as having a ‘Red’ status under their system for quantifying sensitivity (red being the most sensitive and least likely to be developed). GBC have totally ignored all policies on biodiversity when proposing to inset these areas.
New developments are supposed to maintain existing Green infrastructure and improve upon it; in order to secure sustainable development, there should be a net gain for biodiversity. It is impossible to agree that any Green infrastructure which would accompany this development could mitigate for the habitat loss and resultant decline of species.

According to the Council for Protection of Rural England (CPRE), 13% of the most important habitat areas identified in UK BAP occur in the Green Belt, and certain species such as the mistle thrush, song thrush and starling (known to use Site 46) are doing better in the Green Belt than in any other parts of England. Green Belt areas also show more positive trends of bird and butterfly species than in the urban fringes compared to them.

I object to the insetting of Normandy and Flexford (A46 and A47) from the Green Belt on the grounds that these areas contribute to the ‘openess of the Green Belt’

### 2.4.1 Impact on the wider environment of the Thames Basin Heaths Special Protection Area

I believe that the Plan is unsound in relation to Policy A46 as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact that this huge proposed development specifically will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The proposed development is considerably less than five kilometres away from the TBH SPA and not much beyond the 400m exclusion zone, occupying an area between under 1km, to just over 2km, from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. Furthermore, Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals (including dogs being exercised).

I therefore question whether enough - or indeed any - consideration been given to the potentially detrimental effect that the proposed strategic development between Normandy and Flexford will have on this internationally important site.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. Two hundred and sixty four dogs are likely to come with the proposed development, the current ratio of dogs per household being 24/100, so this could potentially attract between 26 and 132 extra dog-walkers a day.

To deter dog-walkers from visiting the TBH SPA, any Suitable Alternative Green Space (SANG) in the proposed development would have to be of exceptional quality, as the Nightingale Road and Dolley's Hill entrances to the TBH SPA are only either 5 minutes away by car, or 20 minutes on foot. Whatever the size, the SANG would be a very small area in which to exercise 264 dogs. A small number of irresponsible dog owners, who do not scoop the poop, will make such a small area unattractive for walk and play. This is already a problem on Normandy Common.

Another factor is that some areas where a SANG might be located are muddy in wet weather and throughout the winter, whereas many of the tracks on the TBH SPA are dry in wet weather, (including the winter). For those dissatisfied with the proposed SANG for whatever reason, or those wanting a longer walk, the natural alternative is the TBH SPA. If only 10% of dog owners use the TBH SPA, there would be 26 extra dogs a day using the TBH SPA; if 50% do, it would be an extra 132 dogs a day.

I strongly believe, that given the proximity of the proposed development to two entrances to the TBH SPA it will be impossible to design a SANG that will deter many residents from using the TBH SPA to walk their dogs. This
will have a very serious impact on the wildlife and overall environment (unique flora and fauna) of this internationally important area.

Natural England states: “Special Areas of Conservation (SACs) are European designated sites, they are afforded protection under the Conservation of Habitats and Species Regulations 2010. Generally speaking, when considering the impacts upon European sites, the Local Planning Authority, under the provisions of the Habitat Regulations, should have regard for any potential impacts that a plan or project may have”.

‘Natural England disagrees with the conclusions reached by the Habitat Regulation Assessment (HRA) and Sustainability Appraisal (SA) and advise that the plan is unsound on this basis’. Natural England states further: “We also have concerns that the Council does not appear to have adopted Government planning policy set out at paragraph 14 of the National Planning Policy Framework (NPPF) stating that local plans should meet objectively assessed development needs unless specific policies in the NPPF (such as protecting designated wildlife sites and landscapes) indicate development should be restricted.”

The Habitats Regulation Assessment document is incorrect. In Section 18 Policies 9, 10, and 13 are assessed but not the policies proposed in this version of The Plan.

Attached documents:

 **Comment ID:** SQLP16/2104  **Respondent:** 15724353 / Arvnid Parmar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

Attached documents:

 **Comment ID:** SQLP16/2126  **Respondent:** 15733665 / Vortal Properties Ltd  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

**QUESTION 2 AND 3: LEGAL COMPLIANCE AND SOUNDNESS**

As a whole our client considers that the Local Plan may be deemed to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.
As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).

In particular our client has concerns regarding the cumulative impact of; Affordable Homes (Policy H2); Policy D1 (Making Better Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published)

The wider conformity with National guidance is considered individually below in our responses to individual policies.

**Attached documents:**

---

**Comment ID:** SQLP16/1909  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Answer:** ()

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In particular our Client has concerns regarding the cumulative impact of the following policies (as amended); Affordable Homes (Policy H2); Policy D1 (Making Better Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published).

The wider conformity with National guidance is considered individually below in our responses to individual policies.

**Attached documents:**

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**Comment ID:** pslp17q/286  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

**Answer:** (No)

**QUESTION 2 AND 3: LEGAL COMPLIANCE AND SOUNDNESS**

1.14 As a whole our Client considers that the Local Plan may be found to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.

1.15 As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).

1.16 In particular our Client continues to have concerns regarding the cumulative impact of the following policies (as amended); Affordable Homes (Policy H2); Policy D1 (Shaping Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published). These issues have not been addressed in the changes.

1.17 The wider conformity with National guidance is considered individually below in our responses to individual policies.
Comment ID: pslp17q/381 Respondent: 17243169 / RSPB (Chloe Rose) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Answer: (No)

Legal Compliance
The RSPB does not consider that the document is legally compliant. The plan can only be adopted if the Council is able, on the basis of all the evidence available, to conclude that the Plan will avoid an adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (or any other Special Protection Area (SPA) or Special Area of Conservation(SAC)), as required by The Conservation of Habitats and Species Regulations 2010 (as amended).

The RSPB has already highlighted, in its objection to the recent planning application for the redevelopment of the Wisley Airfield, that it is profoundly concerned about the potential impacts of residential development at this location upon the Thames Basin Heaths Special Protection Area (TBHSPA). We highlighted that we did not consider that it would be possible for the proposed mitigation measures to overcome the impacts upon the TBHSPA. The key point is that the plan cannot be considered legally compliant if it includes a potentially harmful allocation.

In order to make the plan legally compliant we consider that the inclusion of the Wisley Airfield site must be dropped – it is only if this is done that it will be possible for an assessment under the Conservation of Habitats and Species Regulations 2010 (as amended) to conclude that the delivery of the plan will avoid harm to the Thames Basin Heaths Special Protection Area.

Comment ID: pslp17q/48 Respondent: 17276289 / Tom Newton Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Answer: (No)

Given:

1. rapidly increasing traffic flows (15% increase since 2013 per DoT Traffic count data) on the A3100/A3 southbound off slip and

2. increasing congestion now prevalent causing regular traffic jams in the area and

3. lack of clarity that the combined impact of the Jacobs Well link road and the local plan together are being considered and

4. no current air quality monitoring in the area and

5. no intention to perform any modelling of air quality around the A3/A3100 , an area including a Primary school and intensive housing now and

6. no plan for detailed air quality modelling of the impact of yet more traffic in the area, as identified in the Strategic Highway Assessment report, as the Local plan developments are delivered

the Council will not be able to demonstrate it has met its duty to adequately asses Air quality impacts of the Plan in this area. As such I believe the Plan will be subject to legal challenge incurring extended time delays and cost in its delivery.
<table>
<thead>
<tr>
<th>Comment ID: pslp17q/97</th>
<th>Respondent: 17303553 / Anita Fitchie</th>
<th>Agent:</th>
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<th>Comment ID: pslp17q/101</th>
<th>Respondent: 17303713 / Andrew Fitchie</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance</td>
<td><strong>Answer:</strong> (No)</td>
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As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

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

Document part: Question 3 - Soundness
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Question 3 (2016): Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound?

Question 3 (2017): With regard to the proposed changes to the plan, do you consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole is sound?

Comment ID: SQLP16/2061  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

GRA Comment: It is unsound and unsustainable to develop on the scale proposed. The overall housing target (13,860 new homes) and 40% increase in retail space should be reduced to take account of the constraints of our gap town and growth in online retailing. Opportunities to provide greater accommodation on campus for university students, to provide more homes as part of the North Street development, to plan the river corridor achieving flood risk betterment, to promote sustainable commuting and to open up access across the railway for our physically divided town have not been considered positively.

We do not consider that the proposed housing target of 693 homes a year is soundly based, notwithstanding the intention that this should be skewed to later in the Plan period or the aspiration that this should be linked to timely delivery of infrastructure. We are also concerned that a target of “about 695” homes a year and a focus on strategic sites in the Green Belt were suggested very early in the Plan-making process and we would be concerned if the Plan had been prepared around these working assumptions.

Green Belt and Sustainability

The Council’s case set out in the Green Belt and Countryside Topic Paper paragraph 4,62, is as follows: “We consider that in general terms there are exceptional circumstances that justify the amending of Green Belt boundaries in accordance with the NPPF, paragraph 83. Our evidence base identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns. Each addition or removal to the Green Belt is also separately considered above and in the Housing Delivery topic paper.”

We do not accept this assessment.

- The NMSS SHMA review indicates that the evidence base exaggerates the level of housing need and that the employment housing need assessment is flawed. Increasing housing supply beyond the level suggested by the demographic OAN would not have a discernible effect on affordability but simply mean more people who can afford high prices moving to the area.
- We submit that the economic need should be tested on a sector by sector basis and that the priority given to retail expansion should be questioned.
- Suitable deliverable alternatives, such as significantly increasing campus accommodation, thereby freeing up homes in the town, and provision of more homes on North Street in lieu of a 40% increase in retail, have not been pursued.
- Options for meeting revised need in larger settlements beyond the outer Green Belt boundary linked to sustainable transport have not been fully explored.
- The option of not fully meeting needs in recognition of constraints, including Green Belt, has not been balanced against the positive and negative consequences of fully meeting need (as revised) as should happen in a meaningful Sustainability Appraisal that takes account of environmental capacity.
• Commuting by sustainable means, especially in the context of the current high levels of inward- and outward-commuting, should not be dismissed as an unsustainable option in all the circumstances.
• It would be irresponsible and unsustainable to use up all potential least-worst, last resort Green Belt sites within one plan period.
• High-added-value, knowledge-based businesses and homes should be given priority over expansion in retail land.

Constraints

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and sewer flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. High rise buildings would be inappropriate due to the important contribution views and the rise and fall of the land make to both urban and rural character, including the nationally significant Surrey Hills AONB. The river and railway divide the town and there are too few crossing points; a further constraint. Air quality and traffic noise are not insignificant considerations in some locations.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GRA considers it would be harmful to rural, suburban and urban character, quality of life and the economy of Guildford not to reduce the new housing units delivered by 2033 to a number significantly below 13,860. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

Transport infrastructure is also a constraint. Current congestion is severe by any meaningful definition and there is a backlog of infrastructure investment. Assessment of the very late and incomplete transport evidence by expert, Richard Jarvis, using the information made available to date, indicates that the overall effect of completing the proposed schemes and development in the Plan would be congestion to a level that makes it hard to conclude that the test in paragraph 32 of the NPPF is passed. See extract below and Appendix 2. Any notion that building 13,860 homes is going to deliver infrastructure that will overcome Guildford’s traffic problems seems misguided.

“The cumulative effect of the additional traffic generated by the developments in the proposed submission local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’.”

“The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the proposed submission local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic (47% more than in 2009), for which they are unsuitable. “

In view of the extent of physical constraints, protective designations and congestion, it is likely that even a more accurate, lower OAN housing target would need to be constrained.

We submit that Guildford BC should:
• revise the SHMA to make corrections and to better account for student need
• undertake a proper assessment of constraints, informed by a strategic Green Belt review and a Sustainability Appraisal that tests environmental capacity and considers meaningful alternatives to establish an appropriate balance between adverse effects and fully meeting (revised) need
• test the transport evidence that should inform the plan and which points to congestion.

Any housing figure adopted in the context of considerable uncertainty would need to be kept under regular review.
If any land releases were deemed necessary following a rigorous, strategic and accountable approach to Green Belt review, these should be measured and paced, arising from a robust assessment of the balance between benefits and adverse effects, taking full account of environmental capacity.

Guildford has not currently provided the evidence to derive a housing figure arising from such a process. It is notable that Woking has proposed constraining its OAN by 50%.

In Guildford, if one uses a revised OAN of 10,200 over 20 years (510pa) and assumes no Green Belt development and that 50% of need can be met through positive initiatives in the town, this results in a target of 255 homes pa which would be below the previous target of 322pa. This reinforces the extent to which Guildford is constrained. This would be broadly consistent with the urban capacity assessment undertaken for the last Surrey Structure Plan and with the concern about the risk of town cramming in Guildford identified in the SE Plan.

If one uses a revised OAN of 10,200 over 20 years (510pa) and assumes 20% of all last-resort Green Belt land is released to development in each of the next three Plan periods, this results in a target of 340pa for the current 20 year Plan period.

More strategic solutions, such as development beyond the Green Belt linked to sustainable commuting or a tunnel for the A3, are required now. They cannot be left until the next Plan period as proposed.

**Neglected Opportunities**

A more sound and sustainable approach to planning positively in Guildford should include greater emphasis on the following:

- **Campus accommodation:**

  Higher priority should be given to providing attractive campus accommodation so a very high proportion of university students will want to live on campus thereby freeing up affordable homes in the town. Significantly, this could deliver homes within the challenging first five year period of the Plan.

  There has been some late progress towards meeting the modest 60% student accommodation target agreed in the previous 2003 Plan as a result of residents expressing concern at the lack of progress in meeting the undertakings. However, the opportunity to increase significantly the proportion of university students attracted to live on campus has not been pursued. Neither nostalgia by decision makers for student days spent living in shared houses in the town, nor eagerness by the University to support a case for development on Blackwell Farm, should deflect attention from the opportunity to free up homes in the town for use by others. Nor is it adequate to reject the possibility of increasing campus accommodation by saying the percentage is at the higher end compared with other tertiary institutions or to be sceptical about uptake and funding. We need to plan positively to find sustainable ways to sustain a thriving university in a constrained, commuter belt gap town.

  Appendix 3 provides more information on the opportunity.

- **Flood risk:**

  **Higher priority should be given to work on integrating flood risk management and development in the town centre.** The 2014 Draft Local Plan failed to include a Flood Risk policy and was not informed by a flood risk sequential test or Level 2 Strategic Flood risk Assessment. Subsequent application of the necessary tests has resulted in some residential allocations being removed and some zone 3 non-residential allocation proposed under the exception test.

  Overall, progress has been painfully slow in planning positively along the river corridor in a way that achieves flood risk betterment and also enhances the natural and built environment. Time was lost with a first iteration Town Centre Master Plan that paid insufficient attention to the significant flood risk. The margin required for climate change reinforces the importance of factoring in flood risk and moving away from the old approach of seeking to justify development in even the functional zone 3 floodplain.

- **Sustainable commuting:**
Far more attention should be given to the potential for enabling sustainable commuting recognising that Guildford has a high-value-added economy in a constrained gap town location. Rather than destroying the qualities that underpin the town’s economic success by overdeveloping, the scope for making it easy and affordable to commute by sustainable means from less constrained settlements should be pursued as a priority, both for the short and long term.

The context is that levels of both inward and outward commuting are extremely high. Almost half the working population commutes out to work and almost half of the workforce commutes in. In many households, occupants work in different locations and people do not necessarily move when they change jobs. In 2001, more people commuted out to Rushmoor than vice versa and more commuted in from Waverley than vice versa.

In a Guildford context, the aspiration that more people should live where they work needs to be balanced with other sustainability considerations.

- **All-direction, central bus interchange:**

Failure to identify a central location, and to allocate appropriate land, for an attractive all-direction bus interchange in the town is a grave failing that undermines the soundness of the Plan and should be addressed as a matter of urgency. A central interchange is needed in view of levels of congestion, the gradients involved in town centre journeys, the limited options for crossing the railway and river, and the need to provide sustainable transport options to support complex commuting and travel patterns.

- **Town centre plan:**

Better progress, and a more joined up approach, in town centre planning is required. The slow pace has meant opportunities for coordinated brownfield development are not available as part of this Plan. The need to have brought forward town centre options in a timely way should have been foreseen. Guildford had already used up its green field sites within its Green Belt boundary by the time of the 2003 Local Plan.

It is a problem that Guildford BC has chosen to tackle the town centre after the Plan via an Area Action Plan in which it intends to incorporate Scenario 2 from the Allis & Morrison /Arup proposals that will reduce highway capacity in the centre. This prevents joined up planning. For example, the Plan should face up to the implications of constraints being applied to roads such as the A281, A31 and A322.

- **New cross-town road bridge:**

An additional bridge over the river and railway is required to improve connections across the railways and river for our physically divided town. We want to see the townscape improved, with better use of the river. Achieving this, while maintaining accessibility, will be much easier with a new crossing.

**Sustainable Choices**

Given the scarcity of land arising from being a constrained gap town, the Plan should consider a wider range of sustainable strategies than simply expanding across the board.

- **Balance between retail expansion and town centre homes**

The Plan should weigh the case for a 40% increase in retail space, especially given trends in internet shopping, with the opportunity to provide accessible and sustainable town centre homes. Increased town centre housing provision for the elderly could also have the beneficial knock-on effect of freeing up existing family homes. All types of town centre housing would help support the evening economy.

The wisdom of such massive retail expansion, on top of already generous retail provision, needs to be challenged in view of the fate of the high street in many places. The mix of homes and retail, with its relatively low added-value, in the North Street development should be reconsidered. Residents were dismayed that the Bellerby theatre site was used for yet another supermarket rather than primarily homes.

- **Balance between high-value-added, knowledge-based economy and retail expansion**
Similarly, the mix between land allocated to the high-value-added, knowledge-based economy in the town and to retail expansion should be carefully reviewed. Knowledge-based enterprises yield returns between 3 and 4 times greater than retail.

Planning ahead

In order to deliver sustainable development, it is important to plan ahead. Sites for entrances and, in the shorter term construction areas, for an A3 tunnel through Guildford should be safeguarded. Land should also be allocated for more immediate projects such as an additional crossing over the railway for local journeys.

Attached documents:

Comment ID: pslp17q/473  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Answer: (No)

It is unsound and unsustainable to develop on the scale proposed.

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

Even taking account of all the proposals in the 2017 Plan, including skewing of development to later in the plan period and linking development to infrastructure, congestion which is already severe is set to get worse over the plan period.

In view of flawed new housing evidence and the implications of emerging transport evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, sprawl along the A3 and increased congestion, that cannot be justified in our heavily constrained borough.

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

The overall housing target and increase in retail space should be reduced to take account of the constraints of our gap town, growth in online retailing and potential for sustainable commuting.

Opportunities to provide greater accommodation on campus for university students and to open up access across the railway for our physically divided town have not been pursued sufficiently positively.

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

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

Green Belt and Sustainability

We do not accept the assessment the Council’s case for exceptional circumstances.
• The NMSS SHMA review indicates that the evidence base exaggerates the level of housing need and that the employment housing need assessment is flawed. Increasing housing supply beyond the level suggested by the demographic OAN would not have a discernible effect on affordability but simply mean more people who can afford high prices moving to the area.
• We submit that the economic need should be tested on a sector by sector basis and that the priority given to retail expansion should be questioned.
• Suitable deliverable alternatives, such as significantly increasing campus accommodation, thereby freeing up homes in the town, and provision of more homes on North Street in lieu of a large increase in retail, should be pursued.
• Options for meeting revised need in larger settlements beyond the outer Green Belt boundary linked to sustainable transport have not been fully explored.
• The option of not fully meeting needs in recognition of constraints, including Green Belt, has not been balanced against the positive and negative consequences of fully meeting need (as revised) as should happen in a meaningful Sustainability Appraisal that takes account of environmental capacity.
• Commuting by sustainable means, especially in the context of the current high levels of inward- and outward-commuting, should not be dismissed as an unsustainable option in all the circumstances.
• It would be irresponsible and unsustainable to use up all potential least-worst, last resort Green Belt sites within one plan period.
• High-added-value, knowledge-based businesses and homes should be given priority over expansion in retail land.

Constraints

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and sewer flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. High rise buildings would be inappropriate due to the important contribution views and the rise and fall of the land make to both urban and rural character, including the nationally significant Surrey Hills AONB. The river and railway divide the town and there are too few crossing points; a further constraint. Air quality and traffic noise are not insignificant considerations in some locations.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GRA considers it would be harmful to rural, suburban and urban character, quality of life and the economy of Guildford not to reduce the new housing units delivered by 2034 to a number significantly below 12,426. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

Transport infrastructure remains a constraint. Current congestion is severe by any meaningful definition and there is a back log of infrastructure investment. Assessment of the transport evidence by expert, Richard Jarvis, using the information made available to date, indicates that the overall effect of completing the proposed schemes and development in the Plan would be congestion to a level that makes it hard to conclude that the test in paragraph 32 of the NPPF is passed. Any notion that building over 12,426 homes is going to deliver infrastructure that will overcome Guildford’s traffic problems seems misguided. He writes:

“In terms of its transport aspects, the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.”
In view of the extent of physical constraints, protective designations and congestion, it is possible that even a more accurate, lower OAN housing figure, once it has been identified, would need to be constrained.

We submit that Guildford BC should:

• revise the SHMA to make corrections and to better account for student need
• undertake a proper assessment of constraints, informed by a strategic Green Belt review and a Sustainability Appraisal that tests environmental capacity and considers meaningful alternatives to establish an appropriate balance between adverse effects and fully meeting (revised) need
• continue to improve the transport evidence which points to congestion and work up transport proposals such that both can better inform the plan.

Any housing figure adopted in the context of considerable uncertainty would need to be kept under regular review.

If any land releases were deemed necessary following a rigorous, strategic and accountable approach to Green Belt review, these should be measured and paced, arising from a robust assessment of the balance between benefits and adverse effects, taking full account of environmental capacity.

Guildford has not currently provided the evidence to derive a housing figure arising from such a process. It is notable that Woking applies constraints to its OAN.

More strategic solutions, such as development beyond the Green Belt linked to sustainable commuting or a tunnel for the A3, are required now. Such alternative strategies cannot be left until the next Plan period. Indeed, it is troubling that the proposal for an A3 tunnel has been dropped as an aspiration. This should be being planned now and any necessary land at Gosden Hill and Compton safeguarded.

Neglected Opportunities

A more sound and sustainable approach to planning positively in Guildford should include greater emphasis on the following:

• **Campus accommodation:**

  Higher priority should be given to providing attractive campus accommodation so a very high proportion of university students will want to live on campus thereby freeing up affordable homes in the town. Significantly, this could deliver homes within the challenging first five year period of the Plan. We need to plan positively to find sustainable ways to sustain a thriving university in a constrained, commuter belt gap town. Just as if you provide attractive cycle facilities they are used, if you provide attractive student accommodation, it is used.

• **Sustainable commuting:**

  The revised plan evidence describes commuting as “unsustainable”. This need not be the case. Far more attention should be given to the potential for enabling sustainable commuting recognising that Guildford has a high-value-added economy in a constrained gap town location. Rather than destroying the qualities that underpin the town’s economic success by overdeveloping, the scope for making it easy and affordable to commute by sustainable means from less constrained settlements should be pursued as a priority, both for the short and long term.

  The context is that levels of both inward and outward commuting are extremely high. Almost half the working population commutes out to work and almost half of the workforce commutes in. In many households, occupants work in different locations and people do not necessarily move when they change jobs. In 2001, more people commuted out to Rushmoor than vice versa and more commuted in from Waverley than vice versa.

  In a Guildford context, the aspiration that more people should live where they work needs to be balanced with other sustainability considerations.

• **All-direction, central bus interchange:**
The current site has been declared available for development in an agreement with a developer without an appropriate alternative location being identified in the revised Plan. Failure to identify a central location, and to allocate appropriate land, for an attractive all-direction bus interchange in the town is a grave failing that undermines the soundness of the Plan and should be addressed as a matter of urgency. A central interchange is needed in view of levels of congestion, the gradients involved in town centre journeys, the limited options for crossing the railway and river, and the need to provide sustainable transport options to support complex commuting and travel patterns.

- **Town centre plan:**

Better progress, and a more joined up approach, in town centre planning is required. The slow pace has meant opportunities for coordinated brownfield development are not available as part of this Plan. The need to have brought forward town centre options in a timely way should have been foreseen. Guildford had already used up its green field sites within its Green Belt boundary by the time of the 2003 Local Plan.

GBC’s decision to tackle the town centre after the Plan is preventing joined up planning. The implications of an approach of constraining cross Guildford movement has major implications that need to be understood.

- **New cross-town road bridge:**

An additional bridge over the river and railway is required to improve connections across the railways and river for our physically divided town. We want to see the townscape improved, with better use of the river. Achieving this, while maintaining accessibility, will be much easier with a new crossing.

**Sustainable Choices**

Given the scarcity of land arising from being a constrained gap town, the Plan should consider a wider range of sustainable strategies than simply expanding across the board.

- **Balance between retail expansion and town centre homes**

The Plan should weigh the case for a major increase in retail space, especially given trends in internet shopping, with the opportunity to provide accessible and sustainable town centre homes. Increased town centre housing provision for the elderly could also have the beneficial knock-on effect of freeing up existing family homes. All types of town centre housing would help support the evening economy.

The wisdom of such massive retail expansion, on top of already generous retail provision, needs to be challenged in view of the fate of the high street in many places. The mix of homes and retail, with its relatively low added-value, in the North Street development should be reconsidered.

- **Balance between high-value-added, knowledge-based economy and retail expansion**

Similarly, the mix between land allocated to the high-value-added, knowledge-based economy in the town and to retail expansion should be carefully reviewed. Knowledge-based enterprises yield returns between 3 and 4 times greater than retail.

**Planning ahead**

In order to deliver sustainable development, it is important to plan ahead. Sites for entrances and, in the shorter term construction areas, for an A3 tunnel through Guildford should be safeguarded. Land should also be allocated for more immediate projects such as an additional crossing over the railway for local journeys.

**Attached documents:**
70. The Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2017 is unsound for the following reasons, which are additional to those we reported in July 2016:

(1) The Plan is not consistent with national policy, in the following respect:

- Policies ID2 and A26 particularly would cause substantial deterioration in air quality in Compton, where air quality monitoring shows that NO2 pollution is already (and has persistently been) in breach of legal limits, by attracting additional vehicular traffic through the village to access both the A3 and Blackwell Farm/Surrey Research Park via a new road link from the A31: this is in breach of NPPF paragraph 109 policy for “preventing both new and existing development from contributing to…. unacceptable levels of…. air…. pollution”.

(2) The Plan will not be effective, in the following respects:

- Policy ID2 is unlikely to be deliverable within the Plan period in respect of widening the A3 through Guildford, which is a precondition for implementing Policy A26. Even if it was, it would not meet its own objective of providing appropriate access to the strategic road network to accommodate future planned growth in the form of the Blackwell Farm development – by virtue of generating congestion rather than alleviating it.
- Policy A26 will not be effective because the volume of traffic the proposed Blackwell Farm development would generate on Egerton Road (even if a link road to the A31 is also in place) would cause levels of congestion so high that the network flow would break down in this area, and the Plan proposes no remedy for this.
- Policy A26 will not be effective because the Plan has failed to identify a means of access from Blackwell Farm onto Egerton Road (Infrastructure Requirement (1)), even though this access has been upgraded in the Plan and is no longer ‘secondary’ to the link to the A31; the 1:10,000 plan accompanying the Policy shows no link at all into Guildford.
- Policy A26 will not be effective because Infrastructure Requirement (3) for a controlled road link through the Blackwell Farm development to limit the users of the road will not be implementable in practice.
- Policy A26 will not be effective because the additional road capacity needed to serve the newly proposed secondary school (Allocation item (9)) within the development has not been provided in the Plan and the road network in the area is already modelled to be well over-capacity when Blackwell Farm is developed.
- Policy ID3(3) on developments having regard to the Sustainable Movement Corridor will not be effective in its western section, because either the modal shift will not be pursued vigorously enough to make a significant difference (which appears to be the Local Plan’s preferred strategy), or, if applied with determination (such as by reducing private vehicle lanes in the A3 underpass from four lanes to two) could not be expected by itself to change driver behaviour significantly; in either case the result would be greater congestion on the local road network than it could take after the development of Blackwell Farm.

(3) The Plan is not justified, in the following respects:

- Policy S2 relies on the completion of the widening of the A3 in sufficient time for the proposed numbers of dwellings to be constructed before the end of the Plan period, but this cannot be a justified proposal because there is no certainty at all that the A3 widening will be completed by 2027, if ever; given the difficulty of finding alternative locations likely not to be dependent on capacity increases on the A3, the most appropriate strategy would be to abandon Policy A26.
- Policy A26 would cause the generation of so much traffic (both by itself and by the construction of the A3 without which Policy A26 cannot be implemented) that the local road network could not possibly cope with it, and documents supporting the Plan acknowledge that local roads would be put seriously over-capacity: such an arrangement cannot reasonably be the most appropriate strategy and the Plan is therefore not justified.

Attached documents:
The Guildford Society questions the soundness of the Draft Plan on several grounds, not the least of which are: the shortcomings of the SHMA, the Green Belt report, and the highways assumptions.

The Society condemns the failure to provide for a new link between the west of Guildford which will be expanded substantially under the planned site allocations (in the region of 10,000 homes plus the growing university, the hospital, the expanding research park and other centres of employment by the end of the Local Plan period).

Of greater importance is the notion that the plan does not adequately provide for development beyond the plan period. The Society’s full submission highlights the restrictive nature of the Borough and illustrates the likely future pressures to sprawl along a narrow corridor of the Borough as we have to plan for future pressures to grow.

Attached documents:

Comment ID: pslp17q/512  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:


Answer: ()

We have genuine and serious concerns about the soundness of a plan that fails to deal proactively and comprehensively with the town centre – a critical part of the regional infrastructure for Guildford and surrounding boroughs. We have commented on this in our response to Policy E7 among others and also in our section entitled ‘Issues and Topic papers’.

The housing target numbers are, we believe, mathematically flawed (even after the SHMA which we do not agree with). The tabulated calculation of housing from 2019 to 2034 leaves a 2015-2018 target inclusive of 653 homes per year. Our five-year housing supply falls well short of these numbers. We have commented on this in our response to the Policy S2, the Housing Policies and also in relation to the Housing Delivery Topic Paper (June 2017)

Attached documents:

Comment ID: SQLP16/320  Respondent: 8562209 / C J Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (Yes)

I object to the proposed plan as I consider it is not sound.

Attached documents:

Comment ID: SQLP16/994  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24C. Question 3: Soundness. We do not agree that the Plan is sound for the following reasons:

- “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
• The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
• The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
• The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.
• Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
• The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
• Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
• The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

Attached documents:

**Comment ID:** pslp17q/305  **Respondent:** 8562273 / The Clandon Society (Christopher Dean)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Answer:** (No)

The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no evidence of a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land, this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of residents.

There cannot be a collective vision about critical matters on which there is no detail available—e.g. any future plans for alleviating congestion on the A3 between the M25 and the town. There is little or no recognition of the cumulative impacts of the concentration of development in the north east of the town centre.
The Plan does not consider the implications of Surrey County Council’s business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

The Plan does not consider the implications for the A247 of the large number of developments which have the potential to generate traffic on it:
- slip roads to the A3 off the A247
- Wisley
- Garlick’s Arch
- Gosden Hill
- Slyfield
- Burnt Common
- 4-way junction near Send/Burnt Common
- diverting traffic from the south to go around and not through Guildford

Attached documents:

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Comment ID: SQLP16/269  Respondent: 8566497 / Derek Horne & Associates Ltd (Derek Horne)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

Too many rural and Green Belt sites are proposed within settlements and, in many cases, outside settlements with inadequate infrastructure, including public transport. Such sites constitute unsustainable development contrary to government advice as set out in the National Planning policy Framework. The redevelopment of Town Centre car parks for residential use will irreparably damage Guildford's function as the principal shopping centre in Surrey.

Attached documents:

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Comment ID: SQLP16/524  Respondent: 8567105 / David Calow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

It is not clear if the housing actions achieve the housing objectives. There should be a table showing housing mix and total unmet housing need today and at, say, 5 year intervals for the life of the plan so that the outcomes can be compared with the objectives.

There are no apparent quantified objectives for why the plan creates 69,800m2 of employment space and 3,200 jobs rather than any other number. Is the plan to create opportunities for local people or to encourage more people to move to or commute to Guildford? Will development concentrate on high salary employment and if so in what proportion?

The assessment of the soundness of the infrastructure plans appears to rely on a model. It is not clear how the model has been validated. Looking at plans for Flexford, for example, it is hard to see how extra road traffic could be accommodated even with improvements. A better rail service would help but access to the area is already difficult and dangerous at peak periods.

The plan hopes development can be kept in line with infrastructure improvements but it takes longer to improve infrastructure than to permit development. It is not clear how this objective can be achieved.

Attached documents:
I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx. 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two
reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes per annum and the most recent one, which was done in pre-Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?
The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two-thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

See annexes included with Q1 - ie Independent SHMA reports and land assessment report
1. The plan does not appear to be led by the evidence base, instead the evidence base is used to influence and justify decisions which have been part of a trajectory from day one. This includes the decision to build on Greenbelt, which was decided before any assessment into land availability or housing need had been conducted. Detailed plans for Blackwell Farm were seen long before the Greenbelt & Countryside study produced its controversial study, that marked down the openness of areas with trees yet set random boundaries in mid-field. The scoring of the area was entirely subjective and bore no resemblance to independent work by Land Management Services (attached Annex 1). The work was omitted from the evidence base and should be included or at least acknowledged with some rationale given for its exclusion. Residents felt that some of the evidence was weak and subjective (Greenbelt & Countryside) and comments around lack of justification for the classification of the RAG system have not been addressed. It is totally unacceptable to simply state that 'the page was lost' in answer to the question to see the assessment that led to the 'medium sensitivity' classification given to Blackwell Farm for instance.

2. Housing targets have remained much the same despite changes in ONS, removal of some retail sites, professional challenges to the SHMA and Brexit. This raises concerns over pre-determination. At the last consultation, independent reviews of the SHMA were carried out. All suggested the OAN put forward by G L Hearn was too high. Whilst further work has been carried out by G L Hearn to bring their 2016 up to date, they have once again failed to fully account for errors and market changes. I support the review, commissioned by GRA and carried out by Neil MacDonald (attached as annex 2) which should be considered as new evidence. It should be noted that the work conducted by the same consultant for Waverley Borough Council was recently upheld by the Planning Inspector. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late for this plan and hence the infrastructure constraints must push large sites out of this plan. If the OAN of 8,000 is adopted, this would mean that all the strategic sites could be removed from the current plan and the additional 500 or so could be dissipated over brownfield sites by increasing the density (especially within the University grounds where land is wasted on acres of surface car parking).

3. It is concerning to see that targets are now minimum requirements rather than firm targets. The presumption being a need for upwards adjustment within the plan period rather than general flexibility which would be more acceptable as Brexit for example could result in Internationals leaving the UK. Numbers are also greater than indicated as proposals such as Blackwell Farm already include large numbers planned for after the plan period of 2034. Development that is not planned within the plan period should not be taken out of Greenbelt. It is also very risky to take land out of Greenbelt now for development that cannot take place for at least another 10 years due to limitations with infrastructure. Doing so, risks piece meal development and hence should not be supported.

4. The traffic survey underestimates congestion levels and impact and no attempt has been made to correct this, instead comment is made in the plan that traffic modeling looks at worst case scenario, but in fact it does not. Account must be taken of the comments made by Mouchel (annex 3) which still stand and which remain a concern for Highways. It is misleading to present traffic impact in the way that it has been presented as part of the evidence base. It should also be noted that Highways withdrew their objection following a meeting at which it could be said that some pressure was applied and they did so in order to cooperate. It must be noted from their letter of October 2016 that improvements appear to be conceptual as funding for some and feasibility for all, have yet to be confirmed. This is particularly true of Garlick's Arch which was introduced very late in the last consultation (annex 4). The sound bite that 'there will be no development without infrastructure' to some degree supports the issues raised by Highways in this annex. The Local Plan should however have some detail around this statement. Ie what infrastructure and which developments and what proof exists to endorse the impact and has it been subject to scrutiny?

5. The impact of development is far reaching yet modeling concentrates very much on the impact of specific zones in relation to one another. New evidence by RGP (attached annex 5 and annex 6), appears to be in line with comments...
made by Mouchel (see comment 4) and shows that the impact has been underestimated. It is known that Blackwell Farm and other major developments cannot go ahead without major improvements to the A3, to assist traffic flow. These same improvements will draw traffic and this will include the B3000. It is not thought that a number plate recognition scheme will work through the Blackwell Farm development and if it fails, as is predicted, this will become a legitimate route to bypass Guildford and once will draw more traffic through smaller routes in order to access it. These include the B3000 which already exceeds NO2 legal limits and should be made an AQMA. Account should also be taken of existing AQMA's in Godalming in Waverley, when considering developments that will increase traffic volume and lorries in particular, on the A3. The same must apply in Farnham (which also has an AQMA) when considering development that will increase traffic on the A31.

6. It has been known for some time that the B3000 warrants an AQMA. Recent results confirm that, yet reports continue to boast that Guildford has no AQMA's (true) but also that Guildford does not require any AQMA's (false). The Aecom report stating this, is misleading. It would be quite untenable to knowingly increase traffic levels on the B3000 given the safety issues that exist. I wrote to [Officer] and Planning Policy and received a joint response from both to a report that was sent by me on behalf of the Compton Traffic Committee (a sub-committee of Compton Parish Council). It was suggested that I include the report in my submission to the consultation (attached annex 7). No answers to any of our questions were given on the basis that this would not be a good use of council resources (attached annex 8). It would seem that the council does not have enough resources to ensure that people wishing to respond to the consultation, do so, fully informed. This is born out by comments made in the survey I conducted recently (annexes 9 and 10).

7. The removal of plans to improve access and safety at Beechcroft Drive. This project has been prioritised and dropped for many years and for safety reasons, it was time it was addressed.

8. The vast majority of people in Guildford do not support the plan. A survey was carried out (by me), details of which are attached (annex 9 and 10) which showed that 81% of respondents objected to the plan in its current form versus 19% who supported it. The survey is on-going but interim results were sent to groups with substantial email databases. Comments were collected as to what changes would facilitate support for the plan. These comments are included in the attachment. Whilst I endorse many of them, I do not agree with them all, but in the interests of impartiality have included them all, save a couple that were modified for legal or data protection reasons. In the last consultation many residents and Parish Councils stated that their comments had not been accounted for and that they had significant issues with the process. The process has however rolled onto regulation 19, without, it would seem, formerly closing the regulation 18 plan and hence the issues mentioned in the survey over the process, appear to be not only valid but submittable. There are also several comments about concerns over the deliverability of the 5 year supply, that I share and hence am submitting this to support my own views on this and also to confirm concerns over procedural weaknesses.

9. Changes to the plans for Blackwell Farm were presented as an example of having listened to the public outcry at the scale and location of the site. This was disingenuous as the number is the same except 300 houses have been deferred beyond the plan period. Concerns over access and impact (particularly to the A31, Egerton roundabouts and the B3000) have not been addressed and evidence by RGP that suggested the site was unviable has been ignored. Issues relating to the inclusion of this site are compounded by the addition of a school, that was not deemed necessary for the site from which it was removed at Normandy but has been added to Blackwell Farm, without evidence supporting the need for it?

10. Lack of consistency -- key areas off the Hog's Back have been dealt with differently. Countryside near Tongham has been put forward for additional Greenbelt status to prevent coalescence with Ash, whilst 78 hectares or 192 acres of land at Blackwell Farm will be removed from Greenbelt despite the fact that only 13 years ago, 64 hectares (158 acres) were removed on the basis that this would not be repeated. This will permit coalescence with Guildford and Onslow, Park Barn, Flexford, Wanborough and Wood Street. These figures exclude land that will be needed to facilitate access, much of which is within AONB. The area known as the Hog's Back that stretches alongside the A31 is iconic, it stretches for many miles and provides a fabulous open rural view across land that is good agricultural land as well as Greenbelt. It serves the purposes of Greenbelt by preventing urban sprawl from Guildford into nearby villages. The plan takes the view that sprawl is 'inevitable' which presumes a need to build on Greenbelt without fully exploring all Brownfield possibilities.

11. The strategic site at Normandy (1000) which was safeguarded from 2003 plan, was excluded from the Issues and Options & initial consultation, it was added at regulation 19 stage, which would appear to be against due process and then removed as part of these amendments, for reasons that could equally apply to Blackwell Farm. Neither Blackwell Farm
nor Wisley 'Strategic Sites' have ever been safe guarded. The selection of areas to be included or dropped appears ad-hoc and late additions and speedy removal reminds me of retail 'SALE' tactics, which should not be deployed in plans which will have an irreversible impact on people’s lives.

12. 20 years ago the University argued against the Tesco development on the basis that it would exacerbate an existing traffic. It is incomprehensible therefore that Blackwell Farm can be considered as viable on the location mentioned, some 20 years on, when congestion is already a daily occurrence before development traffic is added. (annex 12)

13. The Rural Economic Strategy and policies have not been subject to proper or open consultations. I do not believe that due process was followed. Parish Councils were not aware of the consultation, which was a tick box affair, over a very short space of time. On finding that the majority of Parish Councils knew nothing about it, I informed the officer in charge and a short extension to the deadline was given. No feedback was given on submissions and comments were not referenced in the strategy, which was produced and published at a paid conference (£60 a ticket or thereabouts) within such a short time frame that one would be forgiven for thinking it had already been written. Parishes have had little to no involvement in this policy and they should have been key stakeholders.

14. In terms of its transport aspects the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.

15. Regulation 19 – The Council report for 16th May 2017 says that ‘comments made to parts of the plan that are unchanged should be considered not duly made’ (para 6). The local development scheme and the Council report (para 4.4 to 4.6) refers to this as a ‘targeted Regulation 19 consultation’. That is incorrect. A regulation 19 consultation is on ‘the local plan’ (see regulations 17, 19 and 20) not parts of it, which have changed from an earlier regulation 19 consultation. A number of consequences follow:

(i) The local plan which is intended to be submitted to the Secretary of State is the 2016 submission local plan;

(ii) The changes proposed in the 2017 document can only be made if:

(a) The Inspector finds that the 2016 local plan is unsound;

(b) The Council asks the Inspector to recommend modifications to cure the unsoundness; and

(c) The Inspector exercises his or her discretion to recommend the changes which the Council have proposed rather than any other changes to make the plan sound;

(iii) The 2017 changes proposed by the Council have the same status as any other changes proposed to remedy unsoundness in the 2016 plan;

(iv) Representations can be made seeking changes, which are consequences of or alternatives to the 2017 proposed changes.

Whilst the buffer over the plan period has been reduced to 10% from 14%, it is unnecessary as GBC confirms that it can provide a 5 year supply. 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.

16. It is noted that there is no explanation in the 2017 local plan document or the Council report as to why the 2016 plan is unsound, the ways in which it is unsound, why the proposed changes would render the plan sound and why they are the best changes to make. I consider the plan ‘unsound’ as do action groups against Wisley and Blackwell Farm developments.
17. 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. This raises concerns that the change was 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. This goes towards a solution for Guildford’s housing needs of strategic sites which may take a long time to come forward rather than promoting smaller, sustainable sites within urban areas with infrastructure or on existing Brownfield sites (which can be in countryside) to enable earlier provision of homes.

18. **Additions and removal of sites. No exceptional circumstances** have been given for the inclusion of sites on Greenbelt and there is no explanation as to why some sites remain in the plan whilst others have been removed.

19. Information -- Throughout the plan it has been a given that Greenbelt sites MUST be included with threats that it would be worse for everyone if the larger sites were not supported as planners would have less control and they would likely be approved after a costly appeal. An FOI shows that this is not the case. To date only one Greenbelt site of the size of the strategic sites put forward in Guildford has been approved at appeal. This was in Tewkesbury. It was also confirmed that planning regulations apply irrespective of how permission is given. It cannot be considered sound to mislead the public in this way?

20. The plan has failed to account for the many thousands of comments made in the previous consultations. The survey (annex 9 and 10) helps to demonstrate how powerless residents feel and the genuine sense of despair that is felt by many who try to engage with the process but feel the plan and the OAN is predetermined and not really evidence based at all.

**Overall issues**

In my view, the overall plan is in contravention of the basic principles of good development and the NPPF. Expansion on the scale purported should see development where infrastructure exists to facilitate urban regeneration and promote sustainable living.

Information appears to be held all over the place and it is difficult to know what exactly we are being asked to do in this consultation. There are different ways of accessing the consultation documents and then there are additional papers and appendices. Some are marked up with the changes but some are not. There is not enough time to read all the documents within the 6 week period.

The survey (attached annex 9&10) confirms the issues many are having with understanding the process and getting adequate information and answers to questions in order to make an informed submission. This in itself must impact the soundness of the consultation.

This plan makes a mockery of Greenbelt policy and the NPPF which states that Greenbelt retain its openness and permanence and development can only be considered (and removed from Greenbelt) if it is appropriate and in exceptional circumstances. No exceptional circumstances have been demonstrated and it is widely thought that the scale of development proposed is to enable highways and infrastructure improvements without due consideration of permissible constraints or impact from the growth proposed.

Comments concerning missing evidence and subjectivity of the Greenbelt study that led to the flawed sensitivity results (red, amber, green) resulted in Blackwell Farm being given medium sensitivity rather than high sensitivity. This in turn has resulted in it being moved forward as 'given' without seeking to address the professional independent evidence submitted in the last consultation, that contradicts this.

It was initially stated that the figure for Blackwell Farm had been reduced from 1800 to 1500 in an effort to reflect public opinion. It was later acknowledged that this 'reduction' was untrue, the extra had been phased for outside the plan period. The same was said of Gosden Hill, which also has housing planned after the plan period.

Language used reflects the direction GBC wish to take the plan whether policies are consistent or not. Page 30 of the AECOM report Box 6.9 Greenbelt around the Guildford urban area, notes that Clandon Golf area is red rated Greenbelt and that it borders AONB and is within AGLV. Blackwell Farm also abuts AONB and is partly within AGLV and access would be via both. This however goes unmentioned.
The employment needs assessment, previously stated that 30% of employers consider leaving the area due to problems with congestion and lack of affordable housing for employees. It also stated that 9% of commercial outlets were empty. The reduction applied to employment land is still therefore insufficient.

**Traffic study**

Compton and Worplesdon Parish Council’s have jointly agreed to fund an addendum to the professional Technical Note, which identified problems with the proposed link road from the A31 to Egerton Road (which will form the sole access to the Blackwell Farm site). The addendum will look at the impact of this new road (and of the entire development) on the surrounding road network in the light of changes to the Local Plan. The planned new road will cross the Surrey Hills Area of Outstanding Natural Beauty, an Area of Great Landscape Value, and historic parkland. It will also pass through, or very close to, a belt of ancient woodland.

**Question over housing need number**

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 is outlined in the two paragraphs below:

“A review of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

"Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically- based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.”

Note that it is important to distinguish between a “demographic need” (births, deaths, migration), an adjusted need figure (which takes into account economic growth and affordability), and the “housing figure” used in the Local Plan (taking account of constraints and ambition). The GRA review is saying that it is a fundamental demographic building block that is wrong.

**Attached documents:**

- Annex 10-SURVEY Final a.pdf (9.1 MB)
- Annex 3 - Highways + Mouchel.pdf (8.3 MB)
- Annex 13 - Green Balance response.pdf (322 KB)
- Annex 11-G Bridger.pdf (4.9 MB)
- Annex 2 - SHMA Review.pdf (849 KB)
- Annex 6.pdf (194 KB)
- Annex 4 Highways Oct 2016 Letter to GBC.pdf (1.3 MB)
- Annex 9-Satisfaction Survey Summary2.pdf (134 KB)
- Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)
- Annex 8- GBC response - Air Quality.pdf (138 KB)
- Annex 5- RGP Technical Note.pdf (265 KB)
- Annex 7 - Issues with Aecom Air Quality Report.pdf (384 KB)
There has been a lack of transparency, lack of scrutiny, and failure to act on errors pointed out by residents and consultees. The GBC Executive has undermined confidence in local democracy and the planning system.

The housing number is overstated, constraints have not been applied, and various parts of the evidence are unsound. I do not consider the plan to be justified.

The plan will create major problems in the future without solving local social housing needs or achieving affordability for those who currently live and work in the Borough. The continued use of appeals as a monitoring indicator will encourage the Planning Committee to allow applications rather than run the risk of losing an appeal. This is a particular concern given the recent changes to the structure of the Planning Committee.

In my opinion the plan goes against national policy in failing to apply (or even to recognise) constraints with regard to Green Belt and infrastructure.

I reserve my right to participate at the examination.

Attached documents:

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Comment ID: SQLP16/963  Respondent: 8575585 / Ian Macpherson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness 

Answer: ()

Question 3: Soundness

The response following repeats the response to Question 1. If the evidence is not wholly satisfactory then it follows that the submission as a whole is not sound.

Unfortunately the evidence used is not wholly adequate, up to date or relevant. This is as much the result of recent external events as matters within GBC's control.

The key areas are * cooperation, * housing and *transport.

* COOPERATION

Set originally for reasons stretching far back into medieval history, the local authority boundaries do not any longer reflect real market boundaries. The Guildford work, shopping and housing areas stretch over the County boundary into Rushmore and far beyond. For one example, the pool of cheap housing for Guildford is in Aldershot. The draft shows signs of discussions with Waverley and Woking but little evidence of in-depth cooperation with Rushmore and beyond - instead, Rushmore and beyond authorities are cooperating with authorities to their west, but not to the east.

THE ORIGINAL 1944 SPECIFICATION FOR GREEN BELT POSTULATED THAT EXPANSION WOULD LEAP THE GREEN BELT. That is Rushmore, not Gosden Hill Farm.

* HOUSING

That the Hearne calculations for housing demand are substantially flawed appears to be a common view, now visibly based on an alternative expert calculation. However, since these original calculations were attached to the Plan documents...
there has been the major event of 'Brexit'. It is expected that Brexit will lead to a considerable decline in immigration from the EU, and, since criteria are likely to be tightened, of some immigration from outside the EU. Not so much of a decline as a simple look at the crude national figures, or the relevant pages in Hearne, but nevertheless a considerable decline is said to be likely. At the same time it is expected that there will be a period of economic stagnation or low growth, which will lead to a decline in the setting up of new households.

So it looks as if the Hearne figures will have to be re-visited, regardless of views as to their original validity. It is understood [verbal] that GBC has this in hand. However it would seem to be demonstrably premature to proceed to acceptance in advance of re-visited and agreed figures.

It is customary in estimating work to publish conclusions that give a mean estimate with a sub estimate of upper and lower tolerances. The Hearne tables appear largely not to do this - instead to put forward a single integer estimate refined to the last digit [as eg 611]. This is surprising, and a word of explanation as to the level of accuracy would be helpful.

TRANSPORT

The sections on transport are the most difficult. They are really quite vague, promising events that are not within the ability of GBC or SCC to deliver.

The lead promise is, of course, the improvement of the A3, where all is vague as to exactly what is to be done. It is not clear how much of the road and transport system an be sorted

But there are many other examples, improvements and changes in the bus services being one. Bus services are provided at the will of the bus operators, and a service exists only where the operator anticipates a profit. There are a few exceptional services that are subsidised, but the relevant Authorities only have very limited funds for this purpose - funds that are being cut and will probably be cut further. Moreover, it seems possible that the Senior Bus Cards will be withdrawn or severely limited, which will reduce the profitability of the existing services further and lead to consequent reductions.

Attached documents:

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**Comment ID:** SQLP16/1184  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

Personal representations in Respect of the Guildford Local plan submission at Reg. 19 Stage

Dear Sirs

1. I object to the Suite of documents identified in General as ‘A Guildford Local Plan’ in that there has never (as required Reg 17 of the Town and Country Planning act ) been a survey of the peoples of Guildford, asking them what they wanted in ‘their’ local plan – thus the whole suite of documents are legislatively ‘unsound’ from its inception

1. The LPA has failed to observe or act on any representations made by the community in response to the Reg. 18 submission for comment, merely continued their trajectory no matter what logical legal and common sense points have been put forward by highly qualified members of the Borough community.

1. They have acted in Secrecy while constructing the suite of documents – only disclosing ‘after the fact’ agreements with developers for the developers owned land to become part of the housing allotted land. They
have failed to act in a manner which demonstrates Open Government and Localism – failing to consult in a meaningful way, merely going through the motions ignoring rational and sensible comments.

1. They have attempted to plan for the goal of rapid development max Houses, no matter the detrimental effects on the existing community, rather than planning for the future, no infrastructure has been included as a ‘must or Shall’ merely a ‘should or maybe’- this is totally unacceptable. To me and from comments across the Borough unacceptable to literally everyone who has actually thought through the Process.

1. Ignored ‘history’ in respect of known requirements in respect to transport infrastructure, while trying to bring in previously undisclosed schemes which are to the detriment of the community being poorly thought out and failing to consult with the communities affected. They have Ignored the need for always junctions at Potters lane and the A320 and link road to the A25, yet attempted to include a road across a flood plain without numeric or logical justification while failing to identify a sensible and rational route to Exit the site (Slyfield)

1. They have produced documents without proper consultation with the community, thus reaching proposals and conclusions which would not have been reached had the community been consulted and their views taken into account. Thus Failing Reg. 18 Process

1. The Document suite is not indexed despite it consisting of over 220 plus documents many duplicate documents with differing names. Some unfinished some clearly not changed since reg 18 despite notification of errors within them.

1. Thus the ability to comment on the plan is like fishing for Iron with a magnet in 50,000 Fathoms… you never quite know if the document you have found is the ‘latest document’ or a previous one, or simply a renamed identical document. – This makes the whole consultation process unsound.

1. Knowing many residents and Community organisations have commented at length – I formerly support their concerns objections and comments, and reserve all their submission at Reg 18 within the Reg.19 process such that the whole process can be challenged and assessed for its weakness of approach to this extremely serious requirement of having a Local plan for the Next 20 years.

I make no observations on the actually documents, as the actual process used to generate them fails the test of following legislative procedure (in respect of involvement of the community) and Soundness. The process has been development based not community based and at Reg.19 they have introduced documents and policies which would have been soundly rejected at Reg. 18 stage due to content and proposals, using half finished ideas and lacking in Numerical or Studious detail expected of such a plan.

I thus consider the plan unsound and failing to follow legislative procedures and formerly request it is sent back to Reg 17 stage for correct method of process namely Asking the community what they want, drawing up a plan to meet those requirements, submitting that plan to the public for comment, taking notice of those comments prior to pacing the plan before and inspector.

Attached documents:

<table>
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<th>Comment ID: SQLP16/5</th>
<th>Respondent: 8581729 / Jeffrey Gargan</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<tr>
<td>Answer:</td>
<td>(Yes)</td>
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I object that Send is to be removed from the Green Belt under policy P2.Send provides a buffer between Woking and Guildford and no exceptional circumstances have been identified that would justify removal from the Green Belt

Attached documents:
I object to policy A43. There is no need for 400 new houses in Garlick's arch addition to the 13,860 already proposed in the Borough. This is a new site which was not included in the Regulation 18 draft and has not been consulted on previously. It is on Green Belt which should prevent the merging of settlements.

There is no need for the 7000sq m industrial development at Garlick's Arch as the latest ELNA assessment shows a reduction of 80% in employment floor space from the previous draft plan. Industrial development could be based at Slyfield.

Attached documents:

I object to policy A44. This proposal for 40 homes and 2 travellers pitches at Winds Ridge and Send Hill is new and was not included in the regulation 18 draft. It is on Green Belt land and has not been consulted on previously.

Attached documents:

While the report recognises the problems already faced by residents in negotiating their way through excessive traffic, it does not make proposals for improving this situation for those of us who live outside Guildford. More traffic will arise from excessive building proposals, making life ever more difficult for those of us trying to access Guildford town, or simply trying to get out of our own villages in rush hour periods.

Attached documents:

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1595  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
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7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1412  Respondent: 8583649 / Bell Cornwell LLP (Jane Terry)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

As currently drafted, the Plan is not sound in relation to the provision of primary health care facilities, in particular in the Farncombe area. This is because no account has been taken to assess the current or future clinical needs of the community and no additional capacity has been built in to the plan for the
increase in population or NHS England’s changing health strategy.
In so far as the Farncombe area is concerned, the additional site allocation for a Centre of Health should be made.

Attached documents:

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<th>Respondent: 8585601 / Jennie Kyte</th>
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**Predetermination of the Draft Local Plan 2016**

Before the first Draft Local Plan was produced the Leader of the Council and the Executive Member in charge of the Local Plan talked about their aim “to roll back the Green Belt”.

Residents objected, but this continued to be strongly promoted and consequently NPPF policies were misinterpreted to allow this to be achieved, and evidence such as the Strategic Housing Market Assessment (SHMA), on which the whole Plan was based and in which a high housing need figure (OAN) was needed to “roll back the Green Belt” was not scrutinised or transparent.

Meanwhile, the Green Belt and Countryside Study (GB&CS) was based on a traffic light system and updated with a sensitivity map, which has no connection with NPPF policies, and was produced to value the Green Belt, and justify and enable it to be built upon. It ignores the five purposes of the Green Belt given in the National Planning Policy Framework (NPPF) para. 80 and the Green Belt as a constraint in the NPPF para. 14, footnote 9.

The spirit and meaning of the term ‘Exceptional Circumstances’ has subsequently been misinterpreted and weakened to allow wholesale Green Belt boundary changes. It has been applied in a way which was not intended and ignores the principle of permanence of the Green Belt. NPPF para.79 states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Normally during the Local Plan process the Green Belt can only be changed in ‘Exceptional Circumstances’. (Under the last Plan process one piece of land was released under Exceptional Circumstances with conditions attached.) The Minister of State, Brandon Lewis, has stated: “The Framework makes it clear that inappropriate development may be allowed only where there are very special circumstances and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local Plan process and with the support of local people. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”

Other ways of providing housing, such as brown field sites were not pursued with any vigour, while those who were consulted and sent in 20,000 responses to the Regulation 18 (2014) consultation were ignored. Furthermore, constraints applied to lower the flawed OAN number, as is allowed, were promised, but have not been applied.

Elections 2015 intervened in the Local Plan process and councillors across Guildford Borough promised in their election leaflets to protect the Green Belt. It seemed that the Green Belt was going to be protected after all and voters voted accordingly. But after the election, the very early political decision to “roll back the Green Belt” was renewed and pursued with the same determination.

**The Draft Local Plan was predetermined and is unsound.**

**The Strategic Housing Market Assessment (SHMA)**

The Strategic Housing Market Assessment (SHMA) has been shown in several authoritative reports to be flawed and unsound. It has not been objectively assessed using consistent data, or scrutinised for flaws and double counting. It has
not been produced in a transparent form with openness about the data used by the Guildford Borough SHMA consultant, G L Hearn, and sub-consultants used. It needs separate reports or sections for issues in the SHMA which are relevant for Guildford only and which could distort the SHMA findings.

**Transport Evidence**

Residents’ concerns about the huge increase in traffic have been ignored and Transport Evidence was produced during the consultation period, too late for scrutiny or review, or for decisions based on evidence to be included in the Draft Local Plan. This is *unsound* practice.

**Consultation: Draft Local Plan 2016**

Significant changes have taken place after the Regulation 18 consultation with new developments in the Green Belt being proposed in the Draft Local Plan 2016 without public consultation. This is *unsound*.

**Special Protection Area (SPA)**

The Special Protection Area (SPA) policy has been misinterpreted by turning existing open spaces into SANGs, instead of providing new open spaces. (This risks land chosen as SANGs in long-established Areas of Outstanding Natural Beauty (AONBs) often at impractical distances from the SPA it is protecting, being harmed by an excess of added infrastructure, contrary to one of the prime purposes of conserving the natural beauty of AONBs.)

**Sustainability Appraisal June 2016**

There is no proper balance in the Sustainability Appraisal June 2016 between economic, environmental and social issues. Throughout the Appraisal it is written that the Council is confident that it can mitigate damage to landscape, but no details are given as to how it can mitigate damage to landscape, countryside and views with proposed developments totalling 13,860 dwellings, nor how it can mitigate the extra traffic congestion and noise of traffic.

The Appraisal’s statement on air quality para.10.71 “*There are no designated air quality management areas within Guildford Borough and whilst there are recognised air quality issues at Guildford Town Centre and at Wisley, it is not possible to conclude that negative impacts will result from growth*” is an inadequate statement to cover this plan period without further investigation.

Noise pollution which is a serious environmental problem for Guildford is not dealt with in this Sustainability Appraisal. The A3 with fast moving traffic goes through Guildford, cutting the town into two halves, causing whole swathes of residential areas across Guildford to suffer from traffic noise. Evidence is needed as to how this can be mitigated and what the impact of even greater amounts of traffic from the proposed developments, which may entail the widening of the A3, would be. The noise impact of increased traffic on rural areas also needs investigation.

In paragraph 10.11.10 of the Sustainability Appraisal (SA of the Guildford Borough Local Plan), it is written: “*Given the extent to which landscape has been applied as a constraint and recognising that the baseline situation would be one whereby development will come forward in an unplanned way, it is appropriate to conclude significant positive effects.*” In a baseline situation the Green Belt would be a significant constraint in itself. This is an illogical, erroneous and *unsound* conclusion.

In para. 10.19.2, it specifically states that it is “Not possible to conclude whether or not the Draft Plan is sustainable.” The specific recommendations which follow this statement have no real significance.

The Sustainability Appraisal needs to be more closely examined as to what is feasible and what is not. It is *unsound* in its assumptions without more detail as to how its assumptions have been reached. Noise pollution needs to be included in the Appraisal.

**Retail Assessment**
The Retail Assessment is weak, and based on flawed and dated concepts. It is apparent that shops are closing and online shopping is growing in popularity, while town centre shopping is decreasing.

The Assessment needs reviewing for soundness and whether the land in the proposed North St development area would now be better used to regenerate the town centre with mainly housing which would bring vibrancy to the town and contribute towards rather than compete with the High St. (For 30 years North St has been run down and from time to time sold or offered to a developer, but no developer has yet snapped up the opportunity to develop this area with retail, which makes one question whether retail is actually needed or would be viable, particularly in these changing times).

- **Safeguarding future options**

  Land needs to be reserved for an A3 tunnel entrance and for a bridge over the railway and river in order to secure these options for the future. It is unsound practice to close down options with such huge potential benefits for Guildford.

- **Bus station/exchange**

  A bus station needed for a transport shift to sustainable travel has not been included in the Plan rendering its sustainable transport policy unsound.

- **Green Belt Policy P2**

  The Green Belt policy P2 of insetting villages needs to be transparent and justified. The evidence in the Green Belt and Countryside Study (GB&CS) appears weak. This should be reviewed to ensure the Plan is sound.

- **BREXIT**

  BREXIT is now an important consideration, but any adjustment made for it, must not be allowed to disguise the underlying flaws in the SHMA. Account needs to be taken of BREXIT for soundness.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/141</th>
<th>Respondent: 8591169 / Michael Bruton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness</td>
<td><strong>Answer:</strong> (No)</td>
<td><strong>Local Plan</strong></td>
</tr>
</tbody>
</table>

I OBJECT to the revised/latest version of the Guildford Local Plan. I request that the following comments together with all my previous objection letters are passed to the Inspector. I reserve my right to appear at the Inquiry and to present my evidence in person.

In addition to my own objections I fully support those made by Mr Andrew Proctor, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] of June 2017. Mr Proctor’s objections are thorough, detailed and well considered. I would like the Inspector also to view/be provided by Guildford Borough Council (GBC) with a video of the C4 Dispatches Programme of 10 July 2017 entitled ‘Secrets of Britain’s New Homes’. This programme explains well the fallacy of so called ‘affordable homes’ as included in any Local Plan and has particular emphasis on Guildford’s Local Plan and housing numbers within the Metropolitan Green Belt within Guildford Borough

2/4

My own objections are as follows:
1. The GBC Regulation 19 Draft Local Plan is unsound and does not take into account my previous objections and the 30,000+ other valid objections made by others to the previous 2016 Local Plan version. I request written confirmation from GBC that my previous objections will be placed before the Inspector at the EIP.

2. I request that the current Draft Plan is amended taking into account all the objections and that this is reissued before its submission to the Inspector. I object to this version of the Plan being considered under Regulation 19.

3. 89% of the GBC area is Metropolitan Green belt. I object that GBC has adopted a lower but still inflated OAN of 12,426 homes without taking into account Planning Constraints as detailed in the NPPF and NPPG.

4. 70% of GBCs proposed new housing is destined for the Metropolitan Green Belt. The Conservative Government has promised to protect Green Belts and both Mrs May and Mr Javid assured the country that this was Government Policy. If the Inspector reads the local Conservative Election Manifesto for the last GBC Council Elections he/she will see similar assurances from Conservative candidates. The proposed Regulation 19 Plan abandons both central and local government assurances regarding the Green Belt. I object on the basis of assurance given.

5. There is a presumption v development in the Green Belt but no such presumption within Guildford Town. In the Plan there should be a much greater emphasis on urban regeneration and brown field development within Guildford Town for residential development. Only 10% of the new housing numbers are proposed for Guildford Town. Town development can be of a higher density but somehow GBC makes no mention of ‘density for development’ in its latest Plan version. Most potential sites are owned by GBC and the Council has the opportunity to develop more houses there if it chooses. I object.

The housing numbers proposed by GBC are based on a flawed SHMA. And GBC has steadfastly refused to reveal the basis for their housing formula. Why ? Indeed the whole proposed plan is already out of date. Town centres are in decline as shopping patterns change. Footfall is in decline as the customer chooses increasingly to shop on line. GBC should reflect changes in lifestyle and shopping habits in their Plan. They have not. I object.

1. The role of any LPA is to be a protector of the environment. However with its property purchases GBC is appearing to become a developer landowner rather than a guardian of planning rules.

2. I object to the inclusion of the three major strategic sites as proposed. They are all sites of outstanding landscape characteristics reflecting the original objectives of the Metropolitan Green Belt – namely openness, the separation of towns/villages one from the other and stopping urban sprawl – particularly from London. The Green Belt in Guildford provides Londoners currently with beautiful countryside on their doorstep. That will be largely eroded if the Plan is approved. The three sites to which I object are Blackwell Farm, Three Farms Meadows(TFM) (the former Wisley Airfield) and Gosden Hill Farm.

3. I object also to the removal of villages around Guildford from the protection of the Green Belt/ revised village boundaries. Such villages as Send, Ripley, Ockham and East and West Horsley are and should remain self contained communities. They should not be subject to significant expansion/ a developer free for all.

4. I wish to comment and OBJECT in some detail to the proposed development of Three Farms Meadows (TFM) in the very small historic village of Ockham. Once the home of medieval philosopher, William of Occam and more recently in the 19Cy of Ada Lovelace, the computer pioneer. This site has already been rejected overwhelmingly in 2016 by GBC Planners and its elected Planning Committee when the Cayman Islands owners submitted an application for 2000+ homes there within the Metropolitan Green Belt. GBC has declined to reveal who is behind this application given its offshore status.

1. Why include a site again which was rejected on at least fourteen different grounds ?

2. It is the least sustainable of the three strategic sites given its location and constraints. That does not make the other strategic sites sustainable !

3. It has no convenient public transport links despite claims by the applicant. It is adjacent to the A3, one of the most congested trunk roads in the county and by Jct 10 of the M25, the busiest junction on the M25.

4. The site is near the famous RHS Gardens at Wisley where congestion already occurs at peak periods, never mind general traffic congestion for much of the day on the A3/M25.

5. The proposed TFM development would overwhelm the facilities of East Horsley and the station car park there is already full most days.
6. The site would have a negative impact on the Surrey Hills AONB.
7. The local narrow lanes in the Ockham area are unsuitable for extra traffic. Cycling in the locality on these roads would be increasingly dangerous.
8. The site epitomises every reason and justification for the establishment of the Green Belt and should not be removed from it or damaged in any way.
9. I object to the fact that GBC has failed to apply Green Belt (GB) constraints to this site – such as GB itself, air quality, lack of infrastructure and protection of the AONB and the Thames Basin Heath SPA.

My OBJECTIONS to GBC’s revised Local Plan remain. The Council has ignored the well considered 1000’s of Objections. And it has spent vast amounts of taxpayer money in so doing. Its revised Local Plan remains unsound.

Attached documents:

Comment ID: SQLP16/25   Respondent: 8593185 / Niels Laub   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I consider the Proposed Submission Plan to be unsound because it ignores guidance in the PPG regarding the use of constraints, bearing in mind that 89% of the borough lies within the Metropolitan Green Belt.

Specifically

Paragraph: 044 Reference ID: 3-044-20141006

Do housing and economic needs override constraints on the use of land, such as Green Belt?

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Paragraph: 034 Reference ID: 3-034-20141006

Can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.

Revision date: 06 10 2014

Attached documents:

Comment ID: SQLP16/1340   Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke)   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Normandy Parish Council strongly objects to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites ("Local Plan") and in particular to the allocation of land south of Normandy and north of Flexford for substantial development.

In principle objection to development of this site

The Parish Council opposes the principle of the development of this site:

1. The site lies within the Green Belt, and has been assessed by Guildford Borough Council (GBC) as having high sensitivity in Green Belt terms, serving to check the southward sprawl of Normandy and northward sprawl of Flexford, preventing the merger of those settlements, and safeguarding the countryside from encroachment (see Green Belt Purposes Assessment, April 2014). Accordingly, given the very significant contribution made by the site to the Green Belt in this area, it should not be developed.

2. The development of the site would not amount to sustainable development within the meaning of the National Planning Policy Framework. GBC’s claim that the approach would be sustainable fails to attach any or any meaningful weight to the environmental aspects of sustainability.

3. The proposed allocation has not been the subject of any proper assessment of highways impacts. The local road network is incapable of coping with the proposed scale of development and there is no evidence that the necessary highways improvements are feasible or deliverable within the plan period.

4. The site lies within 1 km of the Thames Basin Heaths Special Protection Area and accordingly requires substantial provision of alternative green space as an avoidance strategy. Preferable sites for development elsewhere could be delivered without such provision.

The development of this site would significantly affect Normandy and the surrounding area and has not been justified in the Local Plan or in the supporting documents. In addition to the principled objections to the development set out above, the Parish Council considers that there have been substantial flaws in the plan-making process to date which go to both the merits and legality of the Local Plan.

Specific criticisms of the plan making process

A sound plan must be based on proper evidence and consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives (see Environmental Assessment of Plans and Programmes Regulations 2004/1633 and e.g. Calverlon PC v Nottingham City Council [2015] EWHC 1078 (Admin), per Jay J at (67)).

The history of the Local Plan is known to GBC. The Parish Council wishes to emphasise that in the 2014 plan, it was not proposed that this site be allocated for development. Since then, there has been no further Green Belt review, but there has been a Green Belt Purposes Assessment which identified this site as particularly sensitive in Green Belt terms.

There is no explanation in the published documents of the "exceptional circumstances" (NPPF, 80) that are said to justify release of the site from the Green Belt. The Green Belt Capacity Study does not explain why such exceptional circumstances exist, and nor does the Sustainability Appraisal ("SA"). Extraordinarily, the SA states that the development of the site is regarded as a "given" (6.3.16). The SA acknowledges (in footnote 68, p 131) the greater impacts on the Green Belt in developing sites such as this, but does not explain why such development is nonetheless justified on both environmental grounds and by reference to the exceptional circumstances test.

The SA is open to further criticism through its failure to accord any weight to the Green Belt in analysing various options. This is a significant deficiency which renders the SA unsound and indeed unlawful, since the alternatives are not subjected to proper analysis on environmental grounds.
Further, GBC has consulted on the Local Plan with the proviso that this site should be deleted from the plan if it is demonstrated the provision of a secondary school on the site is not required.

However, there has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the "exceptional circumstances" test. GBC's assessment of alternative secondary school sites notes that Surrey County Council's concerns as to remoteness of the site from development are as was only overcome by the new housing provision in the Local Plan i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

The Leader of GBC has suggested that the proposed houses should be regarded as "enabling development". The Parish Council submits that school funding should be achieved through the normal channels and not through the release of Green Belt land to housing development. This suggested cross-subsidy is an unjustified claim (there has been no viability analysis) and in any event is not a proper planning reason for allocating the site for development. The Local Plan is therefore unsound.

**Next Steps**

GBC's consultation on the Local Plan was based on the proviso that policy A46 was to be deleted in the absence of justification for the location of a secondary school at the site.

The Parish Council has seen no proper justification for the location of a secondary school in this Green Belt site. The selection of the site appears to have been justified on the basis that it will be close to the housing identified in the allocation. This makes for an entirely circular argument; the housing is only put forward on the basis of the school, and the school on the basis of the housing.

This cannot amount to an exceptional circumstance for the release of land from the Green Belt. There has been no adequate sequential site assessment for a new secondary school.

In those circumstances, GBC is invited to confirm that policy A46 will be deleted from the Local Plan because the school location has not been justified. The Spatial Strategy should be amended accordingly.

We await GBC's urgent confirmation that the Local Plan will not be proceeding with Policy A46 and that the land in question will remain within the Green Belt.

**Attached documents:**  
[LP2016-Normandy-L_Clarke-Parish.pdf](#) (642 KB)
Comment ID: SQLP16/427 Respondent: 8597601 / St Catherines Village Association (Philip Mansley) Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (Yes)

The strategic sites selected to meet the assessed housing requirement. But the SHMA figure has been challenged. As some of the sites encroach on Green Belt land planning permission for those sites should not be granted unless the SHMA estimates are borne out bu actual statistics.

Attached documents:

Comment ID: SQLP16/574 Respondent: 8598049 / Environment Agency (Jonathan Fleming) Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

Summary of Soundness

We welcome and support a number of the changes that have been incorporated into the Plan since we reviewed the Draft Guildford Borough Local Plan: strategy and sites dated July 2014. However, we consider the Plan to be UNSOUND in its current form due to issues relating to:

- Infrastructure Delivery Plan – Water quality
- Flood Risk Sequential and Exception Tests - site allocations and the justification for promoting certain sites
- Policy P4 – Flooding, flood risk and groundwater production zones
- Site Allocation Policies – safe access and egress of allocated sites A5 and A13

In its current form the Plan does not meet the tests of soundness in terms of being justified, effective or consistent with national policy. These points are summarised below.

- With regards to water quality the Plan does not reflect the evidence submitted in the Infrastructure Delivery Plan for wastewater capacity issues, which may result in an adverse impact on water quality. The Plan is not consistent with the National Planning Policy Framework (NPPF), paragraph 109, and is not justified by a robust evidence base.
- With regards to the Flood Risk Sequential and Exception Tests, we do not consider that sufficient evidence has been presented in this supporting document to justify the conclusions drawn in the Plan with respect to the allocation of certain sites. Without this evidence the Plan is not justified.
- With regards to Policy P4 we do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development. We consider that without specific mention of the flood risks associated with climate change that the Plan is not consistent with paragraph 99 of the NPPF.
- With regards to flood risk three of your allocated sites; A5: Jewsons, Walnut Close, Guildford; A13: Kernal Court, Walnut Close, Guildford; and A14: Wey Corner, Walnut Tree Close, Guildford, do not have the evidence on access and egress to support their allocation in the Plan. Without this evidence the deliverability of these sites is questionable and their inclusion is not consistent with NPPF paragraphs 100-102 of the NPPF.

Further details regarding these points are within our letter submitted 18 July 2016.

Attached documents:

Comment ID: pslp17q/116 Respondent: 8599201 / Richard D Jarvis Agent:
Answer: (No)
See attached comment.

This comment is about one aspect of soundness - making sure that the infrastructure provision in the plan will be sufficient to meet the needs of the increased population and that of the surrounding area. In the case of transport, this is unlikely to be the case. Achieving soundness in this respect would require a lower rate of expansion of housing and more investment in infrastructure.

The assessment of need for housing in the borough over the plan period adopted by the Council is based on flawed analysis, and this undermines the soundness of the plan.

[Text of attachment reproduced below]

1. In terms of its transport aspects the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.

Attached documents: [Q3 Soundness, 20.7.17.pdf (5 KB)]
The Local Plan is not sound.
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

1) The Plan does not consider the implications of Surrey County Council’s business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

2) The Plan does not consider the Waverly B. C. approval for the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3.

3) The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of our residents.

Attached documents:

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Comment ID: SQLP16/168  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (No)

Object. The plan is completely unsound, for the reasons already given, in response to questions 1 and 2.

The housing number has been prepared behind closed doors, without the council having the facility to verify the calculations, or assumptions used.

There is no desire or need to remove the 14 villages from the greenbelt.

The proposals would change the character of the villages forever.

The council has made almost no effort to utilise the large brownfield assets it controls to provide housing, as directed by central government.

The principal architect of the plan is a convicted forger, who behaved fraudulently while in office.

The following changes are necessary to ensure the plan is made sound:

1. No building on the greenbelt, until all available brownfield land has been used up.
2. Require developers to use up their land banks, before any new greenbelt is released.
3. Start from scratch on a new plan rather than trot out the discredited previous plan, virtually unchanged, with no objections dealt with.

Attached documents:

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Comment ID: SQLP16/1312  Respondent: 8640353 / Julian Cranwell  Agent:
We consider that the Local Plan is unsound. Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC has failed to apply any reduction. We consider this makes the plan undeliverable and unsound. We believe it would be harmful to the character, quality of life and economy of Guildford to apply the housing figure to a number of 13,860 new homes by 2033. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site. In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum. After application of constraints the target should be in the range of 250 homes per annum and kept under regular review. The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation. The National Planning Policy Framework requires that objectively assessed needs should be met 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.” The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directive, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we would question whether it is appropriate for the Appraisal to propose meeting needs in full from a sustainability perspective. Notwithstanding guidance that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation. GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider is unsupported. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late.

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/350  Respondent: 8659489 / Helen Bennett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

Much of the proposed housing is on Green Belt land. The GBC should be very energetic in preserving the special qualities of the borough i.e. its open spaces and agricultural land and not be actively trying to encroach on it. Once this land is lost, it is gone forever. One encroachment will lead to many more.

Attached documents:

Comment ID: SQLP16/869  Respondent: 8667713 / Victoria Sinnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

20.A. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green ” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

1. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.
2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
3. The draft Plan does not accord with the NPPF policies on protecting the Green Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the
2. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

1. The 4045% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development nonviable.
2. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
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1. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
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3. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

4. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

5. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

6. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

7. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

8. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been made.

9. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be reassessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1000  Respondent: 8672161 / Simon Page  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

• The Plan is not ready for an inspector.

Attached documents:

Comment ID: SQLP16/326  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

The Plan is unsound because it is not based on objectively assessed development and infrastructure requirements. The housing need is exaggerated (see answer to question 1) and the infrastructure requirements have not been adequately assessed. For example, with regard to Policy/Site A46, it is inconceivable that the local road infrastructure could be improved to an extent sufficient to bear the weight of the additional number of houses proposed; bland assurances that these matters will be addressed at the planning permission stage are simply inadequate. To remove land from the Green Belt against a purely hypothetical, not to say fantastical, infrastructure plan is extremely dangerous and irresponsible. I therefore OBJECT to the Plan on the grounds that it is unsound.

Attached documents:

Comment ID: pslp17q/174  Respondent: 8687041 / Michael Aaronson  Agent:

While I appreciate that much good work has been done since the publication of the 2016 version of the Local Plan I am still not convinced of the soundness of the housing target figure, especially as the methodology by which it was generated has not been made public. This figure shapes so much else in the Plan and it therefore detracts from the credibility of the Plan as a whole if the public does not have confidence in it.

Attached documents:

Comment ID: SQLP16/987  Respondent: 8703585 / N J Axten  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (No)

It does not take account of the concerns from the overwhelming majority of residents about the extent of actual housing demand, which is considerably less than the numbers put forward in the local plan.

Also, it cannot reflect the demographic change now attributing to lower immigration numbers, following the UK leaving the EU

Attached documents:

Comment ID: SQLP16/812  Respondent: 8709249 / Geoff Spink  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly
calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/405  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:


Answer: (No)

I call on the Inspector to send Guildford Council back to the drawing-board with this plan. It is a shoddy effort that takes almost no account of the 32,000 comments (mostly objections) in the last public consultation, or the 20,000 almost identical comments in the consultation before that (on the Issues and Options paper).

Reasons for declaring the draft unsound are too numerous to list, but I wish to highlight the following 6 items:

1. The council have gone to huge lengths to conceal the consultant’s formula apparently used to calculate the OAN, which cannot therefore be scrutinised. They have failed to differentiate between the OAN (which is supposed to be objective evidential data) and their housing number policy target. They have made no effort to address flaws in the SHMA revealed by independent studies well known to residents, which suggest a target more in the order of 4,000 than over 12,000. They have not taken seriously the implications of applying constraints which, by greatly reducing the housing target, would answer many other objections, for instance by preserving the Green Belt. They are also being ambiguous about how development will be phased and how constraints will be applied, suggesting a plan full of moving targets that cannot be properly monitored or evaluated for performance or against government policy over the plan period.

2. The council have deleted a passage in Policy H1 on housing density, leaving it up to developers. This removes a key planning element and makes it impossible for Guildford to comply with Government policy on efficient land use.

3. Policy P1 and E5 reduced protections against development in the AONB, contrary to the declared policy of central and local government.

4. Despite some 52,000 objections in the previous 2 rounds of public consultations, the council is persisting in trying to direct most new development onto the Green Belt, contrary to declared government policy including the NPPF. Whether one agrees with this attempt or not, it needs to be argued through in any plan worthy of the name – for instance, in Policies P2, P3, E5 or the Sites appendices. The council, however, do not say why 70% of new homes need to be on green fields, or 58% in the Green Belt, when common sense suggests most people would like to live in urban or suburban areas where close to employment and other facilities. The plan doesn’t say either why three of the biggest developments need to be in the Green Belt: Wisley “airfield” (which is actually good farmland), Blackwell Farm and Gosden Hill Farm. The NPPF states that the Green Belt can be developed only in “exceptional circumstances”, but the plan does not mention these. The council do not say why most of the borough’s rural villages need to be “inset” from (i.e. kicked out of) the Green Belt against their expressed will. No justification, weak or strong, is advanced for such drastic action. The numerous proposals in the plan for infilling and extending settlement boundaries seem designed merely to support or facilitate an a priori decision to promote maximum development in the countryside and to minimise development in the urban areas. Instead of balancing public and private interests, this plan fails the public by capitulating to developers’ understandable greed for green-field sites that are cheap to build on. A sound plan would need to balance this by a full appraisal of urban brownfield sites available, many of which the council already own but seem strangely reluctant to release for housing.

5. In Policies E1 and E2, the council has similarly taken the caved in to a perceived business demand for retail and commercial space in the town centre. This is probably not what business (such as the Local Enterprise Partnership) actually want, but may seem a soft-option route to easy growth. With 89% of the borough Green
Belt, however, there are obvious objections to devoting scarce urban space to uses of low employment value such as warehousing or dying activities such as town-centre shopping, especially if this means even less new urban residential development. The plan does not say why these areas cannot be developed for low-cost housing that would regenerate the town centre, or for high-value, less space-wasting businesses that are more consistent with Guildford’s well-educated workforce. It also fails to make an assessment of the impact on traffic or existing high-street shops. Instead, it plonks commercial development in cut-off, unsuitable locations, such as Burnt Common, with no balancing arguments about how the consequent damage to the Green Belt can be justified. Policy D1 reveals that the council has failed to address in any serious manner the vast discrepancy between its ambitious development targets and Guildford’s infrastructure deficiencies, which are already a serious constraint on day-to-day life in the borough. Lack of infrastructure was brought forcefully to their attention in previous public consultations. In their public rhetoric, they have recently acknowledged that this is a major problem. But this is not reflected in the latest version of the plan, which continues to rely on vague hopes that the gap might be narrowed through the CIL mechanism or by willing “infrastructure providers”. The council is either being cynical (thinking they can fob the government off with promises of development they know they cannot deliver) or else incompetent (in thinking that so much infrastructure will simply materialise out of nowhere once development is underway). To meet the soundness test, on the other hand, the plan must recognise the reality of Guildford as a congested, exceptionally constrained borough in London’s shadow, and plan only as much economic and housing growth as can predictably be supported in infrastructure terms.

Attached documents:

Comment ID: SQLP16/390  Respondent: 8717921 / Helen Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

Insufficient consideration has been given to the significant number of responses and depth of feeling of existing residents of this Borough

Attached documents:

Comment ID: SQLP16/677  Respondent: 8726529 / Eric Palmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

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4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

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7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. I do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.

14. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances, and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt, can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

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16. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SLP16/626    Respondent: 8729217 / Karen Stevens    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I do not consider that the Plan is sound because huge areas have been taken out of green belt for development.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.
• without an accompanying town master plan, which would demonstrate that proposals for the urban areas and villages and countryside are joined up
• without taking into account the views of the residents, particularly with regard to the levels of growth proposed for the borough and the feasibility of delivering this.
• without putting forward information relating to individual sites in a fair and balanced manner.

All of the above are necessary to make Guildford’s Local Plan sound.

Attached documents:

Comment ID: SQLP16/537  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (Yes)

No

SHMA is deeply flawed. No calculation available, No Scrutiny of figures in Council. Unconstrained numbers.

Look at the independent GRA SHMA which gives a figure of 510 unconstrained. We did tell GBC it was wrong but they repeatedly ignore us and refuse to show the maths behind the numbers.

Attached documents:

Comment ID: SQLP16/1030  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24.C. Question 3: Soundness

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ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “ About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councilors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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Attached documents:

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Comment ID: SQLP16/1533  Respondent: 8735873 / David and Gillian Allan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1278  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

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Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
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**Attached documents:**

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Comment ID: SQLP16/468  **Respondent:** 8749121 / George Paton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (Yes)

NOT sound

1) out of date or irrelevant evidence base

2) secret undisclosed evidence eg model behind the OAN workings

3) failure to set out the proposals clearly in terms the public can understand eg no summary of how the OAN was arrived at

4) failure to apply ANY constraints to the OAN

5) political predetermination outcomes ie selection of certain sites several years ago under the Mansbridge/Juneja leadership

6) failure to set out the exceptional circumstances justifying removal of sites from the Green Belt

**Attached documents:**

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Comment ID: SQLP16/1459  **Respondent:** 8749473 / Charlotte Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (No)

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/72</th>
<th>Respondent: 8766945 / Liz Machtynger Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
</tr>
<tr>
<td>Answer: (No)</td>
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</tbody>
</table>

I do not believe that this plan in any way sound. I would challenge the proposed evidence base (much to large population count for this area), I would challenge the assumptions for infrastructure, even though the borough councillors stated that the infrastructure must come first at the recent council meeting, I do not believe that this would ever be the case and even with investment would not support the huge growth predicted for Horsley's, Clandon, Normandy, Send and Ripley.

The roads are currently under huge pressure (traffic and state of surfaces, speeds and parking), the schools are under huge pressure, Horsley have had a constant battle to remain part of the catchment for the Howard - their only local school, places are very tight already. The local health facilities are bursting at the seams, it takes days to get crucial appointments and I have just waited 10 hours at A&E for treatment.

I believe that the way in which this plan has made assumptions about "insetting" of villages and changing village boundaries then to propose building on green belt land is absolutely astonishing (stronger words would normally be required).

The new sites added in this recent plan to West Horsley have taken local people by surprise, many of my neighbours do not even know of the intention to do so. The nature of these changes proposed to East and West Horsley as well as Clandon would change our villages forever. We have a very strong village and enjoy green countryside, and chose to live here rather than Cobham or other villages which are built up and rapidly becoming additions to London.

The new site proposed for Garlick's arch appears to have been added without any consultation having listened to your recent borough council meeting. I was astonished to hear "its just ancient woodland so it will die out soon anyway". This is an areas of outstanding beauty and with this new site and access to the A3 we will decimate any of the beauty it currently has.
The site proposed for Wisley has already been rejected in recent proposals - mainly due to infrastructure. I consider this to be an irresponsible proposal considering its position, the current traffic, the proximity of small neighbouring villages whose character will be forever changed (and having only a small voice due to their small populations). Rail links although new ones are proposed will not fix the current overload on Effingham and Horsley stations and lack of carriages.

I am a local business owner, I do not believe that the proposals made in this plan are supportive of local businesses other than potentially retailers. Transport, infrastructure, delivery, halls and spaces to work, storage premises are all high on the list of my local business, these have all be provided to the development of the local Horsley plan, this has not yet been considered in this local plan. I wonder how the local people actually have a say in this process if this is the case?

My final point is about this plan process. I have spent hours listening to your borough meetings, with complete dismay. The local people voted for a council that would protect our Green Belt. I wonder where those people have gone? I was also dismayed at the behaviours of other councillors towards those who did try to respect this in your meeting by talking down and dismissing suggestions. I fear that this process is not in good hands, and not truly representing what the local residents require or support.

Attached documents:

Comment ID: SQLP16/1485   Respondent: 8769793 / Laura Richards   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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Attached documents:

Comment ID: SQLP16/854  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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**Comment ID:** SQLP16/931  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

**24.C. Question 3: Soundness**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

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Attached documents:

Comment ID: SQLP16/1882  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

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2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1830  Respondent: 8794753 / Andrew Beckett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
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10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

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Attached documents:

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Comment ID: SQLP16/59  Respondent: 8795361 / Steven Whitaker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

This new plan does not adequately take into account the feedback on the previous draft. Feedback from hundreds of residents has been unashamedly ignored. In particular there was widespread objection to the construction of a new town at Ockham (referred to as Wisley airfield in the plan) and significant new development at East and West Horsley.

If the huge new town at Ockham is ever built this would represent unprecedented destruction of green belt land and alter forever the character of our borough. The council has understated the strain a new town would place on infrastructure and services in the Borough - many of these problems were identified by the borough's own Planning Department in its refusal to grant permission for a new town at Ockham earlier this year.

The planned development of East and West Horsley would swamp these two villages with new housing and ruin their rural character.

In summary the new local plan is a bitter disappointment.

Attached documents:

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Comment ID: SQLP16/1142  Respondent: 8798849 / David Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
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Attached documents:

Comment ID: SLP16/1513  Respondent: 8800545 / Bill Taylor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer:  (No)

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Attached documents:
The Local Plan is not sound. It does not meet objectively assessed development and infrastructure requirements, specifically in respect of housing need and transport infrastructure. It is not based on proportionate evidence. It is very doubtful that it is effective. It is not consistent with NPPF policies in particular with section 9 thereof.

Attached documents:

The report cannot be sound as it is not legally compliant.

In addition, the evidence base documents are poor, so any plan prepared using these documents cannot be considered to be sound - in particular when the declared aim of GBC was "to roll back the green belt". How can any plan produced be sound when this was the declared policy? - and this policy is evident in the details of the plan, which will remove more than 6% of the green belt, and create at least 3 large urban areas in areas that are currently in the green belt, as well as destroying one of the most beautiful areas in the borough, by building across Blackwell Farm.

In particular, the plan is not sustainable. It will result in a very large increase in traffic, as homes are outside the town and so residents would have to travel to their place of work. This was recognised in the Vision and Ambition section of the plan, which said that 2,800 homes were in urban areas, to take advantage of existing infrastructure and services, reduce the need to travel, and offer alternative needs of transport to the private car. All very well - but it means that the other 11,060 homes are planned so they cannot take advantage of existing infrastructure and services, and cannot offer alternative means of travel other than a private car. How could the plan be sound if it is not sustainable?

Attached documents:

1. I object to the draft Local Plan because overall the draft Plan is not sound, and the changes made have not improved it. There are many reasons for believing the plan is not sound, and I have given some of these below. I have given others in objections previously made, and these should be considered with those given below as there is a great deal of detail relevant to this draft Local Plan in my previous submissions.

1.1. This draft Local Plan does not comply with the planning guidelines given in the NPPF, for example, it does not provide exceptional circumstances that are required to be shown before building in the Green Belt can be approved. It contravenes NPPF policies in many other ways, for example, one of the purposes of the Green Belt is to ensure that recycling of previously developed land will occur, and this draft Plan does not do that, about 70% of the dwellings proposed are to be built on green fields, most of which are part of the Green Belt.
1.3. There has been no application of constraints to the housing target. There are many appropriate constraints, such as the existing heavy burden on local infrastructure, which will be further overloaded if the proposed housing target is adopted. One symptom of the infrastructure overload is heavily congested roads across the borough, which gives rise to serious air pollution - but this is not recognised within the draft Plan. There is a need to adopt policies that will improve air quality and ignoring air quality issues is a serious defect in the draft Plan, and so it should be rejected.

1.4. This draft Plan lacks credibility in that it proposes to expand retail space within the town, despite the fact that there are already many unoccupied retail shops within the town. Current retail trends include an ongoing move to internet shopping and home delivery, reducing the importance of bricks and mortar retail outlets. This move is likely to be accelerated by rapidly increasing costs associated with fixed retail premises, such as government mandated increases in labour costs (increases in the minimum wage, auto-enrolment pensions, apprentice levy, etc) and higher business rates. Given increasing costs, it is possible that current trends in retail will impact on leisure outlets, with a growing emphasis on the home delivery of, for example, meals, leading to the closure of some food outlets. The draft Plan does not take account of current trends, nor does it examine the future impact of these trends and means the current draft Plan is not fit for purpose.

1.5. Risk analysis within the plan is inadequate, for example, the risk associated with building too many dwellings has not been considered. That there is a risk associated with a high housing target was shown by the examples of the national housing markets in, for example, Spain and Ireland, in the period 2007 to 2009. It was also noteworthy that the house building programmes in these two countries provided dwellings well in excess of actual need. Despite this being obvious, the price of housing actually increased – until the financial markets crashed in 2007. This was followed by house price crashes that caused great hardship to many households in both countries. It is simply folly to adopt a housing target that is greatly in excess of previously delivered housing without the concomitant consideration of the risks associated with this policy.

1.6. The social housing policy within the draft plan is inadequate and relies on the private sector to deliver “affordable” housing. One of the lessons from the Grenfell Tower disaster is that the current management of social housing is inadequate – witness the installation across the country of external panels that are now deemed to fail flammability tests. This shows the need to re-examine social housing provision and management at both a national and local level. In the specific case of Grenfell, the management company apparently ignored residents’ concerns regarding fire safety equipment and policies. This failure undoubtedly contributed to the disaster. Up to now, Guildford Borough Council have ignored valid concerns regarding their Local Plan, and this bodes ill for the future. The draft Local Plan should be rejected and the council told to think again regarding the provision and management of social housing.

1.7. The draft Plan assumes that house prices are simply a consequence of the balance between supply and demand, and that supplying more houses will result in lower prices. Examples previously cited – Spain and Ireland show that this is not the case. Even though there was a glut of houses, prices in these countries did not fall until after the financial crash. High house prices in the borough (and nationally) are a result of many factors, it is too simplistic to assume prices are determined only by supply. Note that nationally and locally house prices fell or were stagnant during 2008 and 2009 – but this was not because of a huge expansion in the supply of housing. The monetary policies of successive national governments have resulted in an unprecedented period of low interest rates and have fuelled an asset price boom, especially in housing. To compound the effects of asset price inflation, real wages have fallen during the last 10 years – the Office of National Statistics estimated that real wages have fallen by 3.1% since May 2008. This means that the affordability ratio between house prices and wages is very high – but this is not just a supply/demand issue. The draft Plan should be rejected because it is unrealistic to assume house prices are a consequence of only the balance between supply and demand. It should recognise the importance of other factors, with due consideration given to these.

1.8. Guildford Borough needs a large expansion in dwellings for first time buyers and in social housing. Ideally, these would be located close to transport hubs, to reduce the reliance on motor vehicles – and transport hubs are within Guildford Town. Yet much of the housing proposed will be outside the town, with only approximately 10% of the housing proposed inside the town centre. Residents in sites located at some distance from transport hubs will be reliant on motor vehicles – resulting in increased congestion and air pollution. This draft Plan should be rejected because of poor spatial planning.
1.9. Yet another weakness in the draft plan is the lack of the consideration of alternatives, such as using more brownfield sites within the town for housing. The absence of any reasoning for arriving at a plan that proposes building about 70% of housing outside the town on countryside and Green Belt sites suggests that alternatives have not been adequately considered, and so the draft Plan should be rejected.

1.10. Many of the studies and reports that make up the evidence base are weak, with some being indefensible, such as the Green Belt and Countryside Study. Many councillors have commented negatively on this study, yet the conclusions from it have been used to shape the draft plan. There are other examples of poor studies, such as those that underpin the housing target and the Employment Needs Assessment. A plan based on a weak evidence base is bound to be fatally flawed and so the draft Plan should be rejected.

Attached documents:

Comment ID: SQLP16/894  Respondent: 8810113 / Louise Stewart  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

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Attached documents:

Comment ID: SQLP16/345  Respondent: 8817185 / Irene Cope  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I OBJECT TO POLICY H1{HOMES FOR ALL }

Attached documents:

Comment ID: SQLP16/346  Respondent: 8817185 / Irene Cope  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I OBJECT TO POLICY H2 {AFFORDABLE HOMES }

Attached documents:

Comment ID: SQLP16/1821  Respondent: 8818625 / Beth and Frank Fuller  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and
Greenfield sites and each of the above points addressed.

Attached documents:

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Comment ID: SQLP16/1556  Respondent: 8820353 / Gillian Beaton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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Attached documents:
1. Plan to House over 2000 Homes in Wisley

This development implies over 5000 new residents in the area. This development is larger than East Hosley and must be planned like a new town from the outset. The infrastructure requirements that flow from this must be fully anticipated within the boundary of the Wisley development itself. Otherwise the development will not be environmentally sustainable and will cause undesirable and illegal rise in traffic volumes, congestion and consequent CO2 emissions.

In particular the infrastructure within the new development must a much larger parade of shops, space for social infrastructure and a local library as well as a primary and secondary school. It is not sustainable to expect such a large population to drive the 3 miles up the Ockham Road to Horsley for to access social and retail infrastructure. The retail area described at a combined 1100 sq m is much smaller than Horsley and is inadequate considering the number of residents anticipated.

Horsley infrastructure is already overstretched and does not have the spare parking space.

The A3 north of Send is severely constrained by M25 Junction 10/A3 Wisley interchange during rush hours. This is clearly cited in the Key Evidence. The Wisley development (A35) should not therefore be started until the planned Scheme (SRN3) for the new interchange at A3 M25 Wisley Junction has been fully implemented and shown to remove the congestion on the A3 which is unsafe during rush hours. The Plan instead inadvisably encourages early development of Wisley irrespective of the progress of the mitigation schemes such as SRN3.

2. Plan to inset East Horsley and West Horsley from the Green Belt

I object strongly to the plan to take the Horsley villages out of the Green Belt. The plan is illegal and unsound. The Green Belt is there to protect the openness of the country side by restricting the building of new houses and limiting the extending of existing homes to a proportionate extent. The green character and openness of the Horsley villages has been preserved as a highly desirable and intended consequence of the Green Belt legislation. The geography of the Green Belt was defined by Parliament in 1952.

Removing the Horsley’s from the Green Belt is unsound and will gradually destroy the open character of the Horsleys and cause the villages to become over developed loosing the openness of the rural village. The benefit of building circa 500 new houses that are planned in Horsley (after its removal from the Green Belt) is outweighed by the disbenefit arising from the potential loss of green open space that the Green Belt is intended to provide to the 7000 or so residents of the Horsley villages and the 10 million residents of London.

3. Extending the Settlement Boundaries south of the A246.

I object to extending the settlement boundaries at the southern end of East Horsley to the south side of the A246 covering Chalk Lane and the Warren. The proposal is unsound.

The evidence on the character of Settlement areas failed to note that East and West Hosrely ( and Chalk Lane in particular) are adjacent to the SSSI of the Sheepleas. Chalk Lane is also very close to two areas of outstanding natural beauty and is the beginning of the Surrey Hills. Chalk Lane was a rural holiday area. It is situated in a uniquely attractive chalk and limestone cutting has abundant wild flora and fauna. Chalk Lane is still a beautiful tree lined lane which is gradually recovering its former impressive canopy after the devastation of the 1987 storm.

Chalk Lane is a popular green route used by walkers and cyclists to access the Sheepleas and Surrey Hills from Horsley and the A246. It is rural and not urban in character. Swallowing this area up into the settlement of the village will lead to undesirable encroachment of the village of East Horsley on the rural south side of the A246. It will give a green light to unsuitable and forms of urban development and become a prelude to future removal of this area from the Green Belt and further loss of openness and Green Belt.
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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Attached documents:

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**Comment ID:** SQLP16/826  **Respondent:** 8827777 / Mary English  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Glandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

16. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

Attached documents:

Comment ID: SQLP16/1377  Respondent: 8828545 / Anjali Mittal  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

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10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. I do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.

14. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances, and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt, can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

15. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

16. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1186  Respondent: 8835425 / Martin O'Hara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

I THEREFORE REPEAT MY OBJECTION TO THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2016, as many aspects of the same, as outlined above, are either ill conceived, unnecessary or unsound.
I trust that these comments will assist in your consideration of the many issues raised with regard to the Guildford borough Proposed Submission Local Plan: Strategy and Sites 2016.

Attached documents:

Comment ID: SQLP16/1751  Respondent: 8836129 / Roger Shapley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (No)

Response: NO

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the ‘downs’ seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound.

We propose it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033.

We propose it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed.

We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider unsound.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is coincident with the start date of some developments and consequently too late.

Attached documents:

Comment ID: SQLP16/1795  Respondent: 8839041 / Jon Maslin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()
I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot ‘buy into’ this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.
Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant ‘yet to be discussed’ schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

**It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.**

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.
GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as ‘South West Guildford Urban’ is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included ‘significant changes’ according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1583</th>
<th>Respondent: 8840033 / Jimmy Daboo</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
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<tr>
<td>Answer:</td>
<td>(No)</td>
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</tbody>
</table>
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites–which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/443  Respondent: 8843361 / Adrian Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

No the plan is Unsound

 Lets take a step back and look at the bigger picture. The plan is to plan for the sustainable development needs of the borough. Now given that the borough is a physically constrained being a gap town set in the Surrey Hills AONB with 89% of land in the Metropolitan Green Belt. Large parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the ‘downs’ seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

Any right minded person, when reading the NPPF as a whole would have to conclude that given this helicopter view the housing target has to be lower than a “objectively assessed need” if there are valid constraints. It is perverse and “policy on” that GBC have failed to apply any reduction in the OAN. Any reasonable person has to concluded that the plan will be undeliverable and unsound.

Each element has been treated in isolation with no regard to the culmulative impact; it is a bunch of players but not a team capable of winning the cup.

Despite warnings and advice from bodies and public, GBC have taken the SHMA as correct but I an others consider it flawed. They have refused to truly understand the drivers of that SHMA and satisfy themselves the numbers are correct.

A key infrastructure constraint on the borough andits wider environs is the A3. The GBC have made it clear that without infrastructurte improvements, the delivery proposed cannot go ahead. With Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is coincident with the start date of some developments and consequently too late. For that simple reason the plan is unsound.
the current plan has not taken into consideration comments taken in Reg 18 consultation - for example of the 21 supportive Green Belt policy responses out of the 20,000 only 6 individuals agreed with the policy with the rest being developers, GBC, landowners in the plan or consultants.

Attached documents:

Comment ID: SQLP16/2069  Respondent: 8843361 / Adrian Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site. In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review. The National Planning Policy Framework requires that objectively assessed needs should be met 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.” The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. Anybody with knowledge of Guildford would have to conclude that the housing target should be lower than the OAN with this constraints. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation. GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late!

Attached documents:

Comment ID: SQLP16/338  Respondent: 8851969 / Ross Connell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (Yes)

Let's start building new houses and ignore the nimbys.

Attached documents:

Comment ID: pslp17q/145  Respondent: 8852097 / Tim Greenland  Agent:
I do not believe that the proposed submission is sound and OBJECT TO NO CHANGES BEING PROPOSED SINCE THE 2016 CONSULTATION TO INSETTING WEST AND EAST HORSLEY FROM THE GREEN BELT for the following reasons:

The housing targets are significantly over estimated and not supported by objective evidence.

The West Horsley development sites proposed do not meet national policy requirements in terms of sustainability. The roads are already far busier than their capacity allows and they are in appalling condition. I live less than a mile from my local school (The Raleigh) and can't get my children places and so they have to be driven 250 miles per week to separate schools in different directions. The medical centre is under significant pressure due to weight of numbers. The impact on already overstretched roads and services appears to have been completely ignored.

Attached documents:

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Comment ID: SQLP16/365  Respondent: 8858017 / Adam Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

i think that too many houses are proposed with to little being done to improve roads which are already mostly grid locked in the morning and evening

i also think the CIL should not apply to extensions (or at least reduced) as it discriminates against already squeezed family’s i am also concerned that developers will find a way to get out of it

Attached documents:

---

Comment ID: SQLP16/2037  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I object to the Local Plan and consider that the Local Plan is unsound.

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction. I consider this makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford to apply the housing figure to a number of 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.
In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be **500 homes per annum**. After application of constraints the target should be in the range of **250 homes** per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking, does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directive, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we would question whether it is appropriate for the Appraisal to propose meeting needs in full from a sustainability perspective.

Notwithstanding guidance that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider is unsupported.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/489</th>
<th>Respondent: 8858113 / Ramsey Nagaty</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness</td>
<td>Answer: (No)</td>
</tr>
</tbody>
</table>

1 SUMMARY

1.1 I object to the Guildford Borough Council (GBC) Regulation 19 draft plan 2017 because it is not sound and the changes do not take account of my previous objections or indeed the 32,000 other valid objections that are shown on the GBC website and made to the previous 2016 version.

1.2 I have focused, as requested, on changes to which I find reason to object but this also includes some deletions which lack acceptable justification.

1.3 I request a confirmation by email from GBC that all of the objections to changes made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and that all my previous objections to the 2016 draft plan will be placed before the inspector.
1.4 I request again that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

1.5 I am of the opinion that if it is submitted in its current form it will be in risk of being summarily dismissed and put back to the Council for resubmission.

1.6 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have, in this latest Local Plan, adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.7 70% of the new development proposed in this plan is in the permanent Green Belt which was coincidentally invented in Guildford under a private Act of Parliament in 1938. It is perhaps ironic that the process of Town and Country planning has become a type of Town v. Country debate. This is too much of an imbalance and more housing should be allocated to Town and Brownfield sites such as the substantial amount of surface land devoted to car parks in the Borough which could be built over.

1.8 The population in the borough is split equally between town and country but Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking have experienced. It is informative that Woking is currently outperforming Guildford in terms of economic performance.

1.9 It is interesting to note that urban densities in Guildford town are no higher than the villages that surround it. Even though the latter are in the main in the Green Belt which is protected from development and the former is in an area where there is no presumption against development. I am of the opinion we need a rebalancing between town and country and much more development in Guildford town, particularly residential development and the provision of truly affordable housing.

1.10 In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

1.11 GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

1.12 The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.13 I am concerned that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.14 In my opinion much of the updated local plan still appears to be based on out of date thinking. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

1.15 Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

1.16 There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on
the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double the land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

1.17 I regret that my conclusion is that this plan is a clear example of bad planning.

Attached documents:

Comment ID: pslp17q/491  Respondent: 8858113 / Ramsey Nagaty  Agent:


Answer: (No)

3 WHY THIS PLAN IS STILL UNSOUND
3.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

3.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

3.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

3.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites on the Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking and Ash, does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

3.5 Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

3.6 Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met
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.”

3.7 Under this amended policy it is clear that the OAN should be constrained.

3.8 The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

3.9 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

3.10 The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

3.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late!

Attached documents:

**Comment ID:** SQLP16/1322  **Respondent:** 8858881 / Stephen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:**

I do not consider the Proposed Submission Local Plan: strategy and sites “as a whole” to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.
5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the
6. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.
7. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars and there is no indication that Network Rail has any intention whatsoever of building a station at this

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation

17. The proposal to change village settlement boundaries was added to the draft Local Plan without any prior

18. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

1. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale

2. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn

4. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley

5. Cast iron commitments should be included in the plan that development can only commence when required infrastructure improvements, including commitment from Network Rail to build a new station at Merrow, have been

6. The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole is sound.

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land. focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

Under this amended policy it is clear that the OAN should be constrained.

The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?
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The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late!

Attached documents:

Comment ID: pslp17q/516  Respondent: 8865377 / Angus McIntosh  Agent:
Answer: (No)

It would appear the Local Plan ignores the NPPF Paragraph 182.

It is very doubtful whether the Local Plan is legally sound, as key evidence is clearly missing from the document, including a full open assessment of alternative town centre and traffic proposals put forward, such as the DETAILED analysis by the Guildford Vision Groups. Whilst GVG have had a series of open forum public meeting over FIVE years, GBC have held none! Why not? Having an occasional GBC "shop", staffed by poorly informed operatives, is not useful.

Attached documents:

Comment ID: SQLP16/1381  Respondent: 8865537 / P Waldner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial
Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
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10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open

Green Belt countryside in clear conflict with the National Planning Policy Framework

1. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
2. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
3. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
4. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
5. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
6. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale
7. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been made.
8. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy, a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1201  Respondent: 8878241 / Janet O'Hara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

In summary, the National Planning Policy Framework (NPPF) requires that new residential developments MUST respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities. Taking into consideration the points I have raised in my objection, it is clear that NONE of this is being taken into account, particularly with regard to West Horsley, and the proposed high density developments are unbalanced and unsustainable and will dramatically change the character of our village forever. All of this is combined with the dubious legality of removing the villages from being washed over by the Green Belt.

I therefore STRONGLY OBJECT to the Proposed Submission Local Plan: Strategy and Sites June 2016 as many aspects are, in my opinion, unsound and damaging to the villages of East and West Horsley and our community.

Please consider my comments and revise the Proposed Submission Local Plan accordingly.

Attached documents:

Comment ID: SQLP16/1394  Respondent: 8881537 / Jean Baptist  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be
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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1273</th>
<th>Respondent: 8892737 / David Eagle</th>
<th>Agent:</th>
</tr>
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</table>

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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Attached documents:

**Comment ID:** SQLP16/1873  **Respondent:** 8893057 / Dianne Garnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

1.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

1.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. **GBC have failed to apply any reduction which makes the plan undeliverable and unsound.** I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.
1.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review.

1.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

1.5 The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

1.6 The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

1.7 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

1.8 GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

1.9 GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

1.10 GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.

1.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late!

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/842</th>
<th>Respondent: 8893697 / Gill Woolfson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soundness</td>
<td></td>
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<tr>
<td>The Plan is flawed in places and confused.</td>
<td></td>
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<tr>
<td>A fundamental flaw was the presumption of GBC that it would need to build on the Green Belt to meet its housing target. This presumption has led to building on the Green Belt becoming the main focus for development. The Town Centre Plan is incomplete.</td>
<td></td>
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</tbody>
</table>
GBC hopes to remain an historic county town and be a centre for technological industry at the same time. In my view, to achieve this it would need to have a top quality medium rise (4-5 story) technological centre, with workplaces, retail, leisure and flats, in an area offset from the town centre, Slyfield or somewhere similar. This would enable people to live and work sustainably, with the Green Belt countryside available for farming, wildlife, tourism and leisure, and the historic town centre for retail, tourism, housing, particularly more one and two bedroom flats, and leisure. It would also be cost-effective and sustainable, as there would be less need for expensive upgrades to transport infrastructure, as fewer people would be travelling in from the villages.

Taller buildings in Guildford will have to come, if not in this Plan, then in the next, or the one after. How much more far-sighted it would be if thought was given now on where taller buildings could be sited, and to use the Green Belt for the purpose for which it was intended.

A second fundamental flaw is the amount of infrastructure improvement required to deliver the Plan, much of which is unfunded. Some improvements are dependent on external providers, the Highways Agency, Surrey County Council and Network Rail, who may have different priorities. However, I applaud GBC for tackling the problems that Guildford has with its transport infrastructure.

A third fundamental flaw is the amount of extra infrastructure developers are expected to fund. The bulk of these costs incurred by developers will be passed on to property buyers, driving house prices higher.

The plan is not sound in places. I would draw your attention to:

**Duty to co-operate**

I can see no evidence that GBC have co-operated fully with Rushmoor Borough Council (RBC) and Surrey Heath Borough Council. Both the Aldershot Urban Extension (AUE) in Rushmoor and the Princess Royal Barracks (PRB) in Surrey Heath will impact on GBC’s transport strategy and housing numbers. Although both Authorities are mentioned in the West Surrey SHMA, it is not clear where data concerning these sites has been fed into Housing policies. Nor is it clear that GBC have a cross-border Transport Strategy to deal with traffic flow from the AUE and PRB.

**Evidence**

See below, Transport Strategy and Settlement Hierarchy & Settlement Profiles

**Late inclusion of Policies A43 and A46**

These sites were not included in the last version of the Plan. They were not announced until April 2016. This is the first time residents have been able to comment on them, and have had very little time to consider their responses. GBC have been aware of A46 since 2014. Cllr Paul Spooner had the opportunity to engage with Normandy residents on A46 when he addressed Normandy residents in February 2016, but chose not to take it. The NPPF is quite clear that there should be early and meaningful engagements with residents.

**Failure to meet the principles of the NPPF**

There are places where the GBC Submission Local Plan does not meet the principles set out in the NPPF. I have described some of them in comments on individual policies below.

However, in particular, I consider that GBC have not met either its own policies on Biodiversity, found in Policy 14, nor those of the NPPF section 11. There will be a significant net loss of Biodiversity if this Plan goes ahead in full. The GBC Spatial Vision states “Over 250ha, equivalent to more than 350 football pitches, will be provided in perpetuity for the use of residents and visitors. This space will also support and improve the borough’s biodiversity”. This is disingenuous. GBC plans to use 467ha of land that is either farmland or other green space for building. Against this it is creating 249.8ha of mixed use Suitable Alternative Greenspace (SANG) a net loss 218.2 ha of fields and other green space.

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<th>Respondent: 8898401 / Mary-Claire Travers</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td><strong>Answer:</strong> (No)</td>
<td></td>
</tr>
<tr>
<td>For several reasons such as SHMA number is too high according to independent consultant, 'special circumstance' have not been shown to take various sites out of the greenbelt to name a few</td>
<td><strong>Attached documents:</strong></td>
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<table>
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<tr>
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Attached documents:

Comment ID: SQLP16/757  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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1. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

6. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

7. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

8. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

1. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been made.

2. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/2112  Respondent: 8903265 / Susan Anderson  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.
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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. I do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.

14. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances, and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt, can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

15. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

16. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

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Attached documents:
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2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

4. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

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19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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**Comment ID:** SQLP16/1698  **Respondent:** 8905537 / Christopher Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
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Attached documents:

Comment ID: SLP16/1694  Respondent: 8906273 / G Baptist  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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Attached documents:

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**Comment ID:** SQLP16/2105  **Respondent:** 8909761 / Diana Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

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Attached documents:

**Comment ID:** SQLP16/1425  **Respondent:** 8914945 / Nichola Armstrong  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

Question 3: No The Plan is not sound at all. No constraints have been applied to The Plan by Planning Policy. They have not considered the impact on the AONB, the TBHSPA, the Green Belt, the value of agricultural land, the road network, lack of infrastructure, flooding. None of these factors have considered. The decisions taken by GBC have been made by Planning Policy, not the people of the Borough.
The Plan should have included Rushmoor in its cross-boundary discussions. The 4,000 dwellings and 2 new Primary Schools (former Military Town) will have a massive impact on the west of the Borough and although building has begun in Aldershot apparently the infrastructure proposal are not yet published.

Attached documents:

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Comment ID: pslp17q/392  Respondent: 8915297 / Brenda Chamberlain  Agent:


Answer: (No)

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.

In conclusion I consider for many reasons not least those listed above that The Local Plan is unsound and not fit for purpose.

Attached documents:

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Comment ID: pslp17q/118  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:


Answer: ()

Dear Sirs,

UPDATED LOCAL PLAN

Ockham Parish Council (OPC) has reviewed the Updated Local Plan released on 17 May 2017 (the Updated Plan) and wishes to make the following points.

OPC is deeply concerned that with each iteration of the draft Local Plan up to and including the Updated Plan the increasing volume of detailed changes has resulted in some fundamental principles and objectives being lost or obscured.

In preparing this response OPC has therefore focused on examples of basic principle and practical import rather than all the many detailed legal or technical issues - most of which have been raised and responded to previously and which will no doubt be revisited going forward.

The basis of the Updated Plan as a whole

1. The Updated Plan is still based, and indeed in some areas relies even more heavily, on flawed assumptions and approaches. Equally if not more importantly, its overall impact would seem to increase rather than ameliorate some of the adverse consequences stemming from previous versions of the proposed Local Plan. This, to say the least, is disappointing when so much time, effort and cost has been expended not only by GBC but by many other councils, organisations, associations and individuals over the past two or more years.

2. Perhaps one of the most important underlying issues is the failure to take fully into account the reality of the existing physical, geographical, environmental, social and infrastructure constraints in the relatively small and already congested Borough of Guildford, particularly in the north east segment. This does not mean that the Borough has to cease growing or improving but rather the constraints need to be fully recognised and a very delicate balance achieved if the existing benefits and attractions of living, working and visiting the historic Guildford town and some of the loveliest countryside in the South East are to be maintained and enhanced.
rather than damaged or destroyed. It is the quantum and to some extent the location of development rather than the principle of growth which are questionable and unsustainable.

3. Reading and rereading the Updated Plan, OPC is also left with the uncomfortable conclusion that the Plan fails to provide, as a plan should, a practical and sustainable basis on which to progress towards the stated vision. Rather, the Plan seems to be developing a life of its own which is now effectively dictating and changing the The result appears to be a growing disconnect between the “Spatial Vision”, the evidence produced, and the Updated Plan and Policies.

4. Some examples of these flawed assumptions, evidence and approaches are:

- the Green Belt and Countryside Study which does not properly value the objectives or benefits of the Metropolitan Green Belt, or recognise the direct and indirect harm that would result from its diminution. The continued proposed incursions into the Green Belt are unnecessary and misguided. If adopted they would result in unjustified, irreversible and irremediable developments to the detriment of existing and future generations;
- the SHMA’s method of assessment, the omission of a number of relevant inputs, and the conclusion as to the “objectively assessed need” – the last of which at 693 homes is still far too high and is challenged by experts including NMSS;
- the Transport Evidence which was late, is incomplete and not objectively tested, resulting in weak and contestable conclusions and proposals that do not acknowledge let alone address the real underlying problems and constraints, or identify adequate practical solutions or ameliorations (which realistically may in the context of the Plan be physically very limited);
- the unspoken but apparent assumption that the way to resolve problems is to increase them e.g. that the way to relieve congestion is to increase the amount of traffic.

5. Notwithstanding the number of both major and minor changes in the Updated Plan, these and other fundamental flaws and issues from previous iterations remain unrectified and in several respects have actually increased. In OPC’s opinion such flaws and issues, both collectively and in some cases individually, materially undermine the soundness and acceptability of the Plan.

Strategic and Other Sites for Development

1. One prime example of a flawed principle and approach 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), known locally as Three Farms Meadows, as a strategic site for development when it is patently unsuited to such designation.

2. The proposed or potential development of some allocated sites (most particularly the FWA), as envisaged by the Updated Plan, directly conflicts with many claimed aims of that Plan which offers no or inadequate explanation, practical or sustainable solution, or amelioration:

   (1) the claimed aim of conserving and enhancing the Thames Basin Heaths SPA;
   (2) the statement that delivery of allocated sites “is contingent upon the provision of new infrastructure”;
   (3) the acknowledgement that pressures on existing infrastructure and natural environment and additional stress caused by planned growth” must be addressed”.
   (4) the statement that “agricultural land will be protected as set out in national policy and the economic benefits of the best and most versatile agricultural land will be taken into account.”
   (5) the statement that “the NPPF requires 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.”

C. Additionally, the whole concept of “new settlements” such as that proposed for the FWA is unjustified, inappropriate or unsustainable in a relatively small and congested area such as Guildford Borough which has a well established and historic main town, an extensive network of villages and hamlets, and is surrounded by major existing and growing centres such as Woking and Cobham. Even more fundamentally, the FWA is at the centre of that part of the north east of
the Borough which serves as a critically important buffer or lung to a growing greater London – for which the Metropolitan Green Belt was rightly formed and which should be unreservedly protected.

D. The examples quoted in paragraph 4 above and particularly 4(b) in relation to housing need, the change to the end date of the Plan, the lack of justification for even the now reduced buffer over the Plan period, the exclusion of one strategic site (Normandy) and the removal of sites which are more sustainable and more easily developed than FWA, further nullify any rationale for including FWA (A35) in the Plan, given the harm it would cause, and strengthen arguments previously made against development on the FWA, namely:

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, an SNCI and an SSSI;

(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 currently 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) is of limited area and only developable anywhere near to the degree envisaged by the Updated Plan through extreme and inappropriate high density, with high rise buildings, etc.

(g) produces run off which floods the surrounding area;

(h) would be serviced by a rail line two miles distant and with small existing rail stations which are already at capacity in terms of car parking and near capacity in terms of existing passenger numbers, before taking into account organic growth generally in the area and specifically 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) would constitute a single, densely packed and unsustainable development which would effectively destroy Ockham. OPC, as evidenced by housing additions over recent years, supports increases in its housing stock proportionate to the size of the village and its tenuous infrastructure. OPC does not however support a development such as that proposed for the FWA which would increase its size and population by over 14 times;

(m) 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 potentially 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”.

It is also 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 and looking directly down on the Ockham Conservation Area. That land is in any event not owned by the developer applicant and is not included in its latest Amended Planning Application. Other changes to the Green Belt boundary are also wholly unjustified.
The above and many other objections and concerns have been raised on numerous occasions by OPC in relation to the Local Plan (e.g. in its letters of 25 November 2013, 24 June 2014, 22 September 2014, 19 April 2016 and 12 July 2016) and in relation to the planning applications for development of the FWA (e.g. OPC’s letters of 6 February 2014, 29 September 2014, 29 March 2015, 29 September 2015, 29 January 2016 and 4 July 2016).

Similar and other objections and concerns were also raised by e.g. Thames Water, Surrey CPRE, Surrey Wildlife, RSPB, RHS Wisley, Wisley Action Group, Elmbridge and Mole Valley Councils, the Parish Councils of East Horsley, West Horsley, East Clandon, Ripley, Send, and Effingham, and many hundreds of other organisations and individuals.

E. As evidenced by these widespread responses to the various iterations of the Local Plan and FWA planning applications, the objections and concerns are by no means limited to the potential adverse impacts on the small hamlets of Ockham but extend to the much wider impacts on the towns, villages, roads, public transport systems, infrastructure and services in the Borough generally and beyond. OPC considers these impacts to have been insufficiently acknowledged or addressed in the Updated Plan. With other existing, underway and proposed developments in the Borough generally and in the north east segment particularly (e.g. Ockham, RHS Wisley, Ripley, Send, Effingham, East Horsley and West Horsley) and neighbouring Council areas, as well as organic growth near and further away, the totality becomes a totally uncoordinated, unsustainable and unacceptable combination – a prime example of trying to cram a quart into a pint pot.

F. It would be enlightening and beneficial to all concerned if GBC and its advisers and consultants truly listened to the people who live and work in the local area, and who through long experience know well its strengths and weaknesses, what it can sustain and what it cannot.

Regrettably, however, most of these objections and concerns have, it seems, been ignored or dismissed without explanation in the Local Plan and in some respects actually increased in the Updated Plan. It is however noteworthy that GBC, citing many similar objections and concerns, refused planning application 15/P/00012 as amended for development of the FWA. Such refusal is currently under appeal and yet a further amendment to the application has recently been submitted.

It is also interesting that in its Sustainability Appraisal (SA) of the Guildford Borough Local Plan: SA Report Update June 2017, AECOM appears reluctant to make any strong recommendations about the FWA (and a number of other issues) but simply comments in somewhat muted terms on GBC’s previously expressed preferences.

G. If by design or default, GBC wishes all or much of the north east of the Borough to lose effective protection of the Green Belt and effectively to become over time another Woking or Kingston, it should admit this now and give its electors and residents the opportunity to take such personal, political, legal and other decisions and actions as they deem appropriate.

The direct and indirect, existing and future, financial costs, uncertainties and frustrations for local residents, agriculture, business, services and other interests relating to these issues should not be underestimated.

OPC therefore:

- has serious and fundamental concerns regarding the soundness of the Local Plan/Updated Plan as it currently stands; and
- specifically requests that the FWA be deleted as a strategic or other site for development and that all references to development at the FWA be removed from the Local Plan/Updated Plan.

Attached documents:

| Comment ID: | SQLP16/1562 | Respondent: | 8919009 / Andrew Kukielska | Agent: | Document: | Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness | Answer: | (No) |
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The OAN OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/424  Respondent: 8920865 / Glen Travers  Agent:


Answer: (No)

Reg 19 Consultation objection and right to comment on broader issues

My first objection is to due process. GBC has claimed a reg 19 consultation. As a result it has requested comments only on changes and referenced to the particular clause. This is a breach of due process because substantial/material changes have been made to the Draft Local Plan including a major change to the OAHN as stated by Councillor Spooner, removal of one of four only strategic sites which impacts all strategic sites, changes (increased withdrawal in many cases) to the greenbelt boundaries and in particular A35 with and without consent from owners, incomplete data sets and a requirement from Highways England as a compromise for their withdrawal of major concerns at the impact of the Plan on Highways on the A3 that infrastructure has to be in place before major developments ‘come forward in advance of critical infrastructure’:

“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. In addition, the early targeted small improvement schemes Identified to deliver road safety and some congestion relief on the A3 through Guildford. are not committed proposals. Therefore they are not schemes that can be relied upon to be delivered within the plan period.”

All of these changes cannot be considered minor and therefore the request to comment only on the change clause itself is not in accordance with the law. The effect of these attempted changes are that the DLP of 2016 must therefore be considered ‘unsound’ to have caused the major changes and therefore it is not a valid reg 19 consultation.

In that case comments should be allowed to any material aspect of the Plan and not just to particular clauses. Generally, it is disappointing to note that the Council has given very little weight to either the councils own refusal of the planning
application on site A35 or indeed to any of the thousands of representations made by ourselves and other members of the public and statutory bodies.

I am of the view that the current consultation cannot legally constitute a regulation 19 consultation for the reasons outlined by Richard Harwood QC in Appendix 1.

1. I object 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.

2. I object 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.

3. I object to the Council wasting tax payers’ and residents’ time and money not following due process and indeed ignoring previous representations.

I continue to have very serious concerns on the soundness of the evidence base and object in the strongest of terms on the proposed submission plan.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1563</th>
<th>Respondent:</th>
<th>8921857 / Claire Kukiela</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
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<td>Answer:</td>
<td>(No)</td>
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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on...
positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
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9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
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.

**Attached documents:**

---

**Comment ID:** SQLP16/804  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
I object to the Proposed Submission Local Plan (2017) because

1. the very significant modifications require that this should not be a Regulation 19 consultation. A regulation 19 consultation should be on the entire plan not simply the proposed changes;
2. the Council has not indicated why this is deemed a regulation 19 consultation when the changes are major;
3. the extension of the plan period by 1 year has not been identified as a major change;
4. GBC has not explained why the plan is unsound within the original time frame;
5. GBC is wasting tax payers and residents’ time and money by not following due process and ignoring previous representations.

You say in your letter of June 8th this year “We will analyse the comments received during the consultation”: however you are required to take representations into account, not merely analyse them. If analysis is the only fate of representations there is no point at all to them and you are indeed wasting everyone’s time and money and any subsequent plan is illegal and unconstitutional;

Attached documents:

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<th>Comment ID: pslp17q/494</th>
<th>Respondent: 8931105 / Elizabeth Murphy</th>
<th>Agent:</th>
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1. the very significant modifications require that this should not be a Regulation 19 consultation. A regulation 19 consultation should be on the entire plan not simply the proposed changes;
2. the Council has not indicated why this is deemed a regulation 19 consultation when the changes are major;
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness</td>
<td>Answer: (No)</td>
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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burgham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
23. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/453  Respondent: 8948385 / Gillian Eve  Agent:
Answer: (No)

Question 3: Soundness
Answer: No
Comment:

- The Proposed Submission Local Plan is based on flawed evidence (SHMA and SHAR among others).
- There has been insufficient scrutiny of the underlying data and assumptions.
- Insufficient consideration has been given to Green Belt and AONB protection.
- The changes made to the 2016 Plan insufficiently reflect the very many objections / suggestions made as part of the consultation on that Plan.

Attached documents:

Comment ID: SQLP16/1332  Respondent: 8961889 / F Turner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly
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1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1777  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

2.15 As set out in the response to question two above (and repeated below), we consider that the Draft Plan does not fully accord with the National Planning Policy Framework (NPPF) and is therefore not sound. Whilst these issues are set out below in the detailed responses to draft policies, we summarise here why the draft plan is not fully in accordance with the NPPF. 2.16 More detailed comments regarding each of the above points are set out in our responses to specific policies within the Draft Plan.

Attached documents:

Comment ID: SQLP16/750  Respondent: 8970785 / Guildford Residents Association (Graham Hibbert)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

1. Question 3: Soundness

Much as I want to have an updated plan in place soonest and regret that we do not have one now, I do not find this draft to be sound because:

- The SHMA has not be adequately prepared; in particular I am not convinced that issue of student movements has been adequately addressed
- The use of constraints to reflect the special nature of our borough has been rejected
- The proposed transport evidence and plans do not appear to be complete or adequate to deal with current problems and the level of growth proposed.

Attached documents:

Comment ID: SQLP16/937  Respondent: 8971073 / Christine McCaffrey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

Very comprehensive and if implemented within the foreseeable future, will undoubtedly put severe strain of existing roads, schools, medical services etc.
### Comment ID: SQLP16/1948  **Respondent:** 8971137 / Woolf Bond Planning (Thomas Rumble)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  

**Answer:** ()

The National Planning Policy Framework (NPPF) and the Tests of Soundness

The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a DPD should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

Effective means the document must be deliverable, flexible and be able to be monitored.

The positive preparation test also requires plans to be objectively assess development and infrastructure requirements from neighbouring authorities.

### Comment ID: SQLP16/1932  **Respondent:** 8973537 / D. Connor  **Agent:** Andy Stallan (WYG)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  

**Answer:** (No)

Refer to the accompanying separate representation submission document dated 15th July 2016 for details.

### Comment ID: SQLP16/2005  **Respondent:** 8977025 / Sustainable Land PLC  **Agent:** Roger Daniels

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  

**Answer:** ()

No.

The Local Plan is not sound because of its failure to meet the full objectively-assessed need for housing over the whole of the plan period and its failure to achieve a five-year supply of housing land on adoption of the Local Plan. The Review of Green Belt and Spatial Development Strategy have not been based on giving sufficient weight to meeting the full objectively-assessed need for housing throughout the life of the plan.

### Comment ID: SQLP16/1900  **Respondent:** 8993793 / Berkeley Homes (Southern) Ltd.  **Agent:** The Howard Partnership Trust (Vicky Lochead)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  

**Answer:** ()
Answer: ()

Taken as a whole, it is our view that the Proposed Submission Local Plan is fundamentally unsound. At present, the Spatial Strategy and proposed phasing of housing will not deliver Guildford’s Objectively Assessed Need within a reasonable timeframe, if at all. Furthermore, the reliance of the Local Plan on large strategic sites delivered in the latter part of the plan period, for both housing and infrastructure delivery has not been justified against reasonable alternatives. Nor has it been demonstrated to be deliverable and is therefore not effective.

The previous Draft Local Plan (2014), substantially based on the same evidence, allocated Howard of Effingham School, Effingham Lodge Farm and Brown’s Field (Site Allocation 69) to provide homes and an expanded school. This allocation has been removed but in our view remains an appropriate, deliverable and sustainable means of meeting the Borough’s need for new infrastructure and homes.

Our client continues to seek to work constructively with the Borough Council to bring the Effingham site forward and would be happy to discuss any of the above points in more detail.

Attached documents:

Comment ID: SLP16/198  Respondent: 9040673 / Anne Pearse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

I object, A44 proposal will have a major negative impact on the area and in particular Send Hill Road and Potters lane and the adjacent homes. The travellers site in particular will have a major negative impact on the area by introducing a significant number of vehicle move, nets, but of a high gross weight on roads that are not designed to take this type of traffic. The number of Lorraine’s, vans, tippers and trades related ancillary equipment will be both an eyesore and a danger to pedestrians and the locals in general.

Attached documents:

Comment ID: pslp17q/352  Respondent: 9062913 / Susan Parker  Agent:
Answer: (No)

(From Summary) I consider it is not sound. The changes do not take account of previous objections including the 32,000 other valid objections that are shown on the GBC website as made to the previous 2016 version. In terms of appraisal of the Local Plan it is vital that those objections are fully regarded, since many have not been taken on board……

(From section “Why This Plan Is Still Unsound”)

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.
The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. We believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PREASSUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

Under this amended policy it is clear that the OAN should be constrained.

The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020.

Attached documents:
I object to a plan which is fundamentally unsound and ill thought through which includes a site which its own planning committee rejected as unsuitable only then to have it put back again in its Local Plan. How can that be rational?

I object to sites being included almost as an afterthought viz Garlick Arch Ripley. This also proposes to access A3 Northbound at Burnt Common disrupting an already congested A3 which is frequently gridlocked and at a standstill particularly in the rush hour. There is no provision in the plan to relieve current congestion of traffic in Ripley. It is a significant fact that there is more traffic flowing through the village now than there was when the case was made for the A3 to bypass the village.

I object to a plan that does not recognise the number of new houses already been and being created by the normal planning process, by discreet infilling and sensible use of space in cooperation and consent of Ripley Parish and residents. This Guildford Plan does not have this. I object to the number of houses proposed for the Ward of Lovelace as a whole which is not proportionate when the plan is viewed over the whole of the Borough. I object specifically to the totally unrealistic number of houses proposed in the ancient village of Ockham which is already prone to flooding and has an inadequate sewage system. I object to the plan which will increase through traffic including HGV’s on country lanes which connect villages in the Horsleys from current level of severe congestion, to one of a level which could only be called dangerous.

I object to the plan which will move public service bus network already considered inadequate for current needs, to one that will be unable to run at all on account of the congestion the plan as proposed will accrue. I object to the totally unrealistic number of houses proposed in areas which harm the AONB and SSSI, particularly the proximity of proposed housing to such sites and seemingly being unaware the havoc domestic animals, particularly cats, will have on ground nesting birds and other wildlife. The Plan allows for areas of beauty on the one hand and seeks to destroy it on the other.

For all these reasons and many others I argue the Plan is unsound.

Attached documents:

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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper
balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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**Comment ID:** SQLP16/808  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

**24.C. Question 3: Soundness**

Do you consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
(1) The Plan is not consistent with national policy, in the following respect:

- Policies ID2 and A26 particularly would cause substantial deterioration in air quality in Compton, where air quality monitoring shows that NO2 pollution is already (and has persistently been) in breach of legal limits, by attracting additional vehicular traffic through the village to access both the A3 and Blackwell Farm/Surrey Research Park via a new road link from the A31: this is in breach of NPPF paragraph 109 policy for “preventing both new and existing development from contributing to…. unacceptable levels of…. air…. pollution”.

(2) The Plan will not be effective, in the following respects:

- Policy ID2 is unlikely to be deliverable within the Plan period in respect of widening the A3 through Guildford, which is a precondition for implementing Policy A26. Even if it was, it would not meet its own objective of providing appropriate access to the strategic road network to accommodate future planned growth in the form of the Blackwell Farm development – by virtue of generating congestion rather than alleviating it.
- Policy A26 will not be effective because the volume of traffic the proposed Blackwell Farm development would generate on Egerton Road (even if a link road to the A31 is also in place) would cause levels of congestion so high that the network flow would break down in this area, and the Plan proposes no remedy for this.
- Policy A26 will not be effective because the Plan has failed to identify a means of access from Blackwell Farm onto Egerton Road (Infrastructure Requirement (1)), even though this access has been upgraded in the Plan and is no longer ‘secondary’ to the link to the A31; the 1:10,000 plan accompanying the Policy shows no link at all into Guildford.
- Policy A26 will not be effective because Infrastructure Requirement (3) for a controlled road link through the Blackwell Farm development to limit the users of the road will not be implementable in practice.
- Policy A26 will not be effective because the additional road capacity needed to serve the newly proposed secondary school (Allocation item (9)) within the development has not been provided in the Plan and the road network in the area is already modelled to be well over-capacity when Blackwell Farm is developed.
- Policy ID3(3) on developments having regard to the Sustainable Movement Corridor will not be effective in its western section, because either the modal shift will not be pursued vigorously enough to make a significant difference (which appears to be the Local Plan’s preferred strategy), or, if applied with determination (such as by reducing private vehicle lanes in the A3 underpass from four lanes to two) could not be expected by itself to change driver behaviour significantly; in either case the result would be greater congestion on the local road network than it could take after the development of Blackwell Farm.

(3) The Plan is not justified, in the following respects:

- Policy S2 relies on the completion of the widening of the A3 in sufficient time for the proposed numbers of dwellings to be constructed before the end of the Plan period, but this cannot be a justified proposal because there is no certainty at all that the A3 widening will be completed by 2027, if ever; given the difficulty of finding alternative locations likely not to be dependent on capacity increases on the A3, the most appropriate strategy would be to abandon Policy A26.
- Policy A26 would cause the generation of so much traffic (both by itself and by the construction of the A3 without which Policy A26 cannot be implemented) that the local road network could not possibly cope with it, and documents supporting the Plan acknowledge that local roads would be put seriously over-capacity: such an arrangement cannot reasonably be the most appropriate strategy and the Plan is therefore not justified.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SLP16/478</th>
<th>Respondent: 9437921 / Grace Ashby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td>Answer: (Yes)</td>
<td></td>
</tr>
<tr>
<td>I do not think this plan is sound as the volume of increase in housing is not adequately supported by the current road network.</td>
<td></td>
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</tbody>
</table>
Additional junction on the A3 will help congestion through Guildford, but the volume of traffic already causes significant congestion on the A3, hogs back and A323

Attached documents:

Comment ID: SQLP16/470  Respondent: 10570785 / Philip Coleman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (Yes)

The plan is sound and well balanced. It considers the needs of the borough as a whole and not just the (vocal) interests of property developers and home owners masquerading as concern for the green belt. I strongly support it and in my view it cannot be implemented quickly enough.

Attached documents:

Comment ID: SQLP16/1506  Respondent: 10619169 / Wendy Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and
leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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Attached documents:

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**Comment ID:** SQLP16/256  **Respondent:** 10717985 / Alison Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (No)

I object to the suggestion that the proposed submission local plan: strategy and sites as a whole is sound.

I completely disagree that this is the case, for the following reasons:
I object because the evidence base used was faulty and unsound. The rationale behind the notion of need to build on Greenfield sites within Guildford Borough is faulty – it is based on poor data and - since the the EU referendum result - unsound assumptions. For example there will not be a need to accommodate the inward movement of international migrants that was previously assumed.

I object because it proposes excessive and unjustifiable numbers of housing need. In 2014 even within the council itself it was recognised that the number suggested for housing at that time was excessively high. So this miscalculated and misconstrued total was been reviewed by the Scrutiny Committee of the council, who decided the housing number needed to be reduced. Given that now even higher housing development is proposed, the current proposals are completely unsound.

I object to GBC's fundamental confusion of housing need with housing demand. This major confusion invalidates many of their arguments for increased housing in the area and renders the local plan unsound.

I object because GBC propose building on Greenbelt land, removing villages from the Greenbelt and failing to heed Government guidance on the issue. Compelling and convincing arguments for building on Green Belt are not provided, in that no ‘special circumstances’ (NPPF) are outlined. These are required by Government guidance. This is another very significant factor undermining the sounds and fitness for purpose of the local plan. It is of note that Local MP Paul Beresford has stated that the Local Plan is not fit for purpose.

Attached documents:

Comment ID: pslp17q/78  Respondent: 10717985 / Alison Drennan  Agent:


Answer: (No)

The 2017 Local Plan is not sound, it uses unsound data, ignoring the views and objections of local residents, and fails to provide exceptional circumstances for building on the Green Belt, and suggests wholly disproportionate an unfair development around Send and Ripley.

Attached documents:

Comment ID: pslp17q/79  Respondent: 10717985 / Alison Drennan  Agent:


Answer: (No)

GBC has completely disregards the tens of thousands of complaints made by local residents with regard to disproportionate development in Send and Ripley, and to building on the Green Belt. It has also disregarded comments that point out the unsoundness of the ‘evidence’ GBC provides with regard to housing need.

Attached documents:

Comment ID: SQLP16/1096  Respondent: 10750945 / Lorna Crispin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
We do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1450  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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Comment ID: SQLP16/1609  Respondent: 10773441 / Barry Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

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<th>Comment ID: SQLP16/1715</th>
<th>Respondent: 10782689 / Murray Dudgeon</th>
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<tr>
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1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

**Comment ID:** SQLP16/1258  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

**I do not consider** the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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We consider that the Local Plan is unsound. Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. **GBC have failed to apply any reduction. We consider this makes the plan undeliverable and unsound.** We believe it would be harmful to the character, quality of life and economy of Guildford to apply the housing figure to a number of 13,860 new homes by 2033. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be **500 homes per annum.** After **application of constraints the target should be in the range of 250 homes** per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. **The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.**

The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directive, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we would question whether it is appropriate for the Appraisal to propose meeting needs in full from a sustainability perspective.

Notwithstanding guidance that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. **GBC has not included details of its Town Centre Master Plan and urban**
development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation. GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider is unsupported. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late.

Attached documents:

Comment ID: SQLP16/1987  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (No)

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The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound.

We propose it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033.

We propose it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed.

We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

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GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider unsound.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is coincident with the start date of some developments and consequently too late.

Attached documents:

Comment ID: SQLP16/18  Respondent: 10799489 / Shai Sinai  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()
I object. Sound evidence has not been provided.

Attached documents:

**Comment ID: SQLP16/572  Respondent: 10802177 / roger harrison  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (No)

A sound plan would start by correctly identifying the geographic and social context of Guildford and its villages. The methodology of this Plan could be used to concrete over the entire Green Belt, and, the South East of England could become a megalopolis.

A sound plan would take account of the massive response to the previous flawed Plan in 2014.

A sound plan would look at the constraints imposed by the nature of a gap town, as well as of the infrastructure which is itself constrained by those physical hills and rivers.

A sound Plan would set out practical and legal reinforcement of barriers to unwanted development on Green Belt land, SSSI and AONB.

A sound Plan would press the University of Surrey to accommodate its students within existing planning permissions.

**Comment ID: pslp17q/113  Respondent: 10807745 / Belinda Middleton  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Answer:** (No)

The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

1) The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council (GBC) to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of residents.

2) The Plan does not consider the implications of Surrey County Council’s (SCC) business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247 through West Clandon.

3) The Plan does not consider the Waverley Borough Council’s approval for the development of 1,800 homes at Dunsfold. This has the potential to feed traffic, which is trying to avoid congestion around Guildford, onto the A247 to access the A3.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1046</th>
<th>Respondent: 10808833 / David Brandon</th>
<th>Agent: Vail Williams (Suzanne Holloway)</th>
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<tr>
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<td>Please see statement below</td>
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<tr>
<td><strong>Attached documents:</strong></td>
<td><a href="#">final rep wellington house July 2016 (3).docx</a> (1.1 MB)</td>
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<th>Comment ID: SQLP16/1372</th>
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Attached documents:

Comment ID: SQLP16/1448  Respondent: 10816993 / Jane Roberts  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SLP16/68</th>
<th>Respondent: 10818241 / Vanessa Birchall-Scott</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<tr>
<td>Answer:</td>
<td>(Yes)</td>
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I object to the plan which is unsound in terms of evidence base of requirements, inappropriate building on green belt and insufficient process/ account taken of residents views

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SLP16/274</th>
<th>Respondent: 10818945 / Fabian Steele</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<td>Answer:</td>
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I consider the assessments made in the local plan are deeply flawed in respect of infrastructure.

Drains and sewage

Residents of the Horsleys are aware of the situation with flooding and drainage in the local area. The current sewage system and drains is always overwhelmed by heavy showers of rain and the drains frequently block. Before there can be any extra demand placed on these systems there would have to be a redesign of the entire system. It would require substantial reconstruction prior to any extra housing.

Roads

The Villages have mostly B roads which are unable to sustain all of the extra traffic. The roads are narrow and full of pot holes. There are crossings not suitable for large traffic volume throughout the villages. Large numbers of cyclists use the roads for training, especially at weekends. It is not possible to overtake safely on large stretches if the roads. Any increase in traffic of the volume suggested would result in gridlock and a big increase in traffic accidents.

Shops/doctors/dentists

they are insufficient to deal with all the extra people.

Before any new homes can be built the infrastructure has to be massively upgraded.
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/380</th>
<th>Respondent: 10834081 / Stephen Vincent</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I am afraid I do not trust the and the executive</td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/64</th>
<th>Respondent: 10846241 / John Ford</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>I do not consider the Proposed Submission Local Plan strategy and sites as sound because of the contradictory nature of GBC's assessment of housing requirement in Send and Ripley in recent years.</td>
<td>Attached documents:</td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1674</th>
<th>Respondent: 10846625 / Frank Drennan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 The National Planning Policy Framework requires that objectively assessed needs should be met 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.” The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment is deficient and biased in the range of alternatives it considers.</td>
<td>Attached documents:</td>
<td></td>
</tr>
<tr>
<td>1.2 GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.</td>
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<tr>
<td>1.3 GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.</td>
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<tr>
<td>1.4 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too for the current decision process and leaves a crucial gap in the decision support information. Any decisions made in the absence of this crucial information will be deficient and unsound.</td>
<td>Attached documents:</td>
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| Comment ID: pslp17q/176 | Respondent: 10846625 / Frank Drennan | Agent: |
The proposed changes to the plan are wholly unsound. As noted in my response to Question 1 the evidence base is at best flawed and at worst highly misleading, significantly overstating the OAN. The plan then compounds these foundational errors by failing to apply appropriate constraints taking due consideration of the need to protect the Green Belt. Further the plan fails to demonstrate any exceptional circumstances justifying the erosion of the Green Belt which would result from the plan's implementation. 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

Attached documents:

1.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

1.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below \textbf{12,426} new homes by \textbf{2034}. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

1.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be \textbf{400 homes per annum} and the housing target after the application of constraints should be in the range of \textbf{200 homes per annum} and kept under regular review.

1.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

1.5 Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.
1.6 Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESCRIPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

1.7 Under this amended policy it is clear that the OAN should be constrained.

1.8 The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

1.9 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. 1.10 The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

1.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late!

Attached documents:

Comment ID: SQLP16/1229  Respondent: 10857889 / William Kyte OBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

It is unsound and unsustainable to develop on the scale proposed. The housing target and substantial increase in retail space should be reduced to take account of the constraints and the growth in online retailing.

Sustainable transport cannot be realised without a central bus station and a proper bus/rail interchange.

The implications of Brexit need to be considered and taken into account.

Attached documents:

Comment ID: pslp17q/317  Respondent: 10857889 / William Kyte OBE  Agent:


Answer: (No)

The Local Plan remains unsound because it is based on flawed evidence and constraints have not been properly applied which lead to an overestimated housing figure. Some of the changes made in this draft exacerbate this.
The 2017 Draft Local Plan is still deeply flawed and should be rejected to enable these flaws to be corrected.

Attached documents:

Comment ID: SQLP16/2118  Respondent:  10858977 / Angela Otterson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.1.6 GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.
Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late!

Attached documents:

Comment ID: SQLP16/1770    Respondent: 10859553 / MARK Curtis    Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

Question 3: Soundness

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of
its current building plans and substantially increase the proportion of students on campus. If the University built the
outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding
permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and
infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this
approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need
underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the
methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two
reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both
consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one,
which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in
Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that
the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not
consistent with national policy. The definition of 'exceptional' is
forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites
of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely
therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would
fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as
railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town,
the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will
have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as
the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan
will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer
funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive
and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the
purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted
and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met
Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly
recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for
views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if
this site were approved and if access could be made possible without causing serious problems to the surrounding road
network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its
Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates
making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the
same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks
consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting
infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will
materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as ‘South West Guildford Urban’ is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included ‘significant changes’ according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to
residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

**Comment ID:** SQLP16/7  **Respondent:** 10871169 / Lynn Durbridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (Yes)

I object to the proposed plan for Send and Ripley, I feel that the scale of it is more that the area can cope with. The infrastructure is not in place to be able to cope with such a large development. There is already a lot of traffic through the village and at peak times is constant and very slow moving. The scale of the new plan does not take this into account and the roads would grind to a total stop. There is no proof of the need for the industrial space and the number of new homes has been based on exaggerated figures.

The subsoil of at least one of the proposed sites has documented unsafe landfill waste, which is currently vented. Other sites have permanent Green Belt status and include ancient woodlands and beautiful countryside, some of which stop Guildford and Woking from forming into one!

**Attached documents:**

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**Comment ID:** SQLP16/13  **Respondent:** 10871169 / Lynn Durbridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (Yes)

I object to the lack of infrastructure and forward thinking within the hugely over the top and totally unnecessary loss of Green Belt land in the new proposed plan for Send and Ripley. I already have to wait over month for a regular appointment with my GP and it is hard to get emergency/urgent appointments with a designated doctor. The road to the local school is always a nightmare to navigate and the schools are always fully subscribed. The roads in general are at virtual standstill at peak times and the traffic through the village never ends. How does the new plan take this into account and apart from a massive new road junction what plans are there to make this all work smoothly?

**Attached documents:**

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**Comment ID:** pslp17q/298  **Respondent:** 10882465 / Colin Bowes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Answer:** (No)

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 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.

I object to the proposed extended developments within the Green Belt – there are no “exceptional circumstances” which could possibly justify the potential development of such a large area of protected land to the NE of the borough.

I object to housing numbers, which also appear to be unsound. Again, you have ignored Green Belt constraints.

I object to the lack of consideration given to infrastructure, especially in the case of the former Wisley Airfield, which is close to already congested highways. Your Highways Report is unsound. Services are already creaking and many oversubscribed.

I fully support the objections submitted by WAAG, and Ockham and Ripley Parish Councils which are too numerous for me to include, nevertheless I wish my objections and those of the above organisations to be fully taken into consideration and that you amend the Plan accordingly.

Comment ID: pslp17q/410  Respondent: 10883905 / Anita Marshall  Agent:


Answer: (No)

I wish to object to the Local Plan which I consider to be unsound and not fit for purpose.

1. I object to the proposed extended developments within the Green Belt – there are no “exceptional circumstances” which could possibly justify the potential development of such a large area of protected land to the NE of the borough.

2. I object to the lack of consideration given to infrastructure, especially in the case of the former Wisley Airfield, which is close to already congested highways. Your Highways Report is unsound. Services are already creaking and many oversubscribed.

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
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6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1519  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. The housing DAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councilors before being adopted.

2. The DAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, ADNB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an DAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

4. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

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5. Much of the infrastructure required to support the level of development proposed is outside the Council's control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The
infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

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16. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

17. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, Page 16 of 17

18. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

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**Attached documents:**

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**Comment ID:** SQLP16/1276  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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Attached documents:

Comment ID: pslp17q/85  Respondent: 10944513 / Amber Ellis  Agent:


Answer: (No)

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to, the following reasons:

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17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

23. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

---

Comment ID: SQLP16/278  Respondent: 10949729 / Ivan Szabo-Toth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I am objecting to the local plan for Send, Send Marsh and Burnt Common. I object to the number of houses that the plan intends to deliver (693 per annum) and in particular Garlick's Arch (Policy A43) and the development of 2000 homes at Gosden Hill Farm Merrow.— Policy A25. I also object to the 2 new A3 sliproads at the A247 clandon road (Policy A43A).

I object as this is in clear contravention of the central government's stated commitment for Green belt protection. I also object because the local infrastructure (medical, schools, roads, transport) etc is already stretched to breaking point and will not support the further development in the local plan.

Regards

Ivan Szabo-Toth
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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2. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the

3. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and so

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1. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
   1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
   2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

2. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
3. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

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      2. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a "nil" basis.
      3. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured
6. The status of the text which accompanies each policy box is not. If the accompanying text does not have the force of policy, a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/172  Respondent: 10955713 / Christopher Parker  Agent:


Answer: (No)

My comment relates to Policy A25: Gosden Hill Farm, Merrow Lane, Guildford and in particular to the second stated infrastructure requirement that:

"Any proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road."

It is unsound that this hugely significant aspect is simply referred to and presented in aspirational terms as a "potential opportunity". The proposed development at Gosden Hill Farm should be contingent upon the timely provision of a new four-way road junction with the A3 during the very early stages of the site development. This would be a junction.
providing on and off vehicular access to both the south bound and the north bound carriageways of the A3. Though Policy A25 makes it an infrastructure requirement that a new A3 southbound on-slip is provided together with a relocated southbound off-slip there is no such infrastructure requirement for any new access to or from the A3 north bound carriageway. I find this omission to be extraordinary and fundamentally unsound, particularly as I raised this aspect in my previous comment on the Draft Local Plan (see my email dated 22 September 2014). It is unsound that there is no clarification, definition or explanation in Policy A25 of how access to and from the northbound A3 carriageway will be achieved for the eventual residents, visitors and workers of the hugely significant Gosden Hill Farm development.

Attached documents:

Comment ID: pslp17q/422  Respondent: 10956833 / Aiden Clegg  Agent:
Answer: (No)

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.

Attached documents:

Comment ID: SQLP16/835  Respondent: 10957025 / Pauline Masters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:
1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/86  Respondent: 10957441 / Christopher Hunter  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
Answer: ()

I object

Attached documents:

Comment ID: SQLP16/90  Respondent: 10957441 / Christopher Hunter  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
Answer: (No)

I object

not sound st all!

Attached documents:

Comment ID: SQLP16/1245  Respondent: 10959009 / Rebecca Claridge  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
Answer: ()

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Attached documents:

Comment ID: SQLP16/1671  Respondent: 10962785 / Derek Gilmore  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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<thead>
<tr>
<th>Comment ID: SQLP16/1539</th>
<th>Respondent: 10972065 / Sarah Cocke</th>
<th>Agent:</th>
</tr>
</thead>
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13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

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Attached documents:

Comment ID: SQLP16/1189   Respondent: 10990145 / Anne Lee   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

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4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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Attached documents:

Comment ID: SQLP16/1079  Respondent: 10997121 / Rob Curling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

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Attached documents:

Comment ID: SQLP16/1713  Respondent: 11007393 / James Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
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8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/266  Respondent: 11012129 / William Lawrence  Agent:
Answer: (No)

Generally, this plan is still fundamentally unsound, unsustainable, and contains either data that is erroneous and misleading or simply missing. It does not provide a considered proposal for sustainable development.

The Gosden Hill development specifically, is ill conceived and its location has been chosen for reasons of ownership rather than suitability. It is a ill informed ‘knee-jerk’ solution with no serious consideration of alternatives.

The basis on which this plan is conceived is far from robust. No genuine assessment can be achieved from these nonspecific proposals. There has been little accurate assessment any of the relevant criteria; traffic, utilities, pollution and the environment.

This revised Draft Local Plan should be totally rejected. Its unimaginative solutions are unworkable and not fit for the twenty first century. New holistic solutions need to be addressed, accurate assessments made new and innovative options explored.

Attached documents:

Comment ID: SQLP16/225  Respondent: 11016001 / Brenda Tulloch  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
I object on the grounds that local infrastructure cannot cope with the additional houses. Do we have enough school places - Medical resources and capacity on the roads.

Attached documents:

Comment ID: SQLP16/550  Respondent: 11025281 / Alan Willmott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (No)

I believe the proposed plan will be to the detriment of both an AONB and the green belt.

It will substantially impact upon Guildford as being a desirable area to live in, focussing primarily on economic concerns not qualitative considerations.

Attached documents:

Comment ID: SQLP16/1640  Respondent: 11036289 / Osman Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

*I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.*

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? *The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.*

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.
Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant ‘yet to be discussed’ schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met
Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.
The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included ‘significant changes’ according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

**Attached documents:**

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**Comment ID:** pslp17q/290  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness  
**Answer:** (No)

I Object to the above new Local plan and its amendments because the evidence and assessments Guildford Borough Council(GBC) has used are unsound, policies and proposals for development in the borough conflict and do not make sense. Also it does not take account or heed the many(32,000) objections to the previous 2016 draft plan. Much of the proposed sites for development, which are the subject of the majority of objections by residents are within Greenbelt. This is because Guildford and its villages are situated within and constrained by the Surrey Hills and Greenbelt area. The proposals for these sites are ridiculous and unrealistic with regard to sustainability and infrastructure. The size and extent of them would cause harm and destruction and contrary to any benefit to local people.

GBC has not taken a balanced approach to housing need between the town and country areas, preferring to focus on and sacrifice Green Belt and countryside instead of proposing more houses in the urban area(towns outside the Green Belt/AONB), which is against government policy. Why is this? Guildford residents including myself have objected to this approach since 2014 and this has been ignored. We are still being ignored. GBC has ignored the National Policy guidelines. Government policy urges development on brownfield sites and the protection of Green Belt and special sites to be paramount. This is laid down in the NPPF(National Planning Policy Framework 2012). There has to be exceptional circumstances for any Green Belt land to be built on or boundaries changed. The fact they have included the ‘Proposed Sites for development ’ means that any wording about protecting Green Belt is a sham. They have included policies which have effectively weakened protections of the NPF, planning 70% new housing in the countryside, 58% in Green Belt and allowing more development in AONB without scrutiny. By definition this is not an exception and there is no attempt to show exceptional circumstances to justify any of either the housing or giving proper weight to protecting Surrey Hills from inappropriate development.

The extent of the housing in Green Belt and the effect of insetting/removal from Green Belt goes contrary to NPPF paras. 87-89. If they are true to their promise (manifesto to be guardians of the Green Belt) GBC should follow the NPPF guidelines. There is unsubstantiated opinion in the plan that there is need for more retail, office and industrial space. The low percentage of residential development in the town centre on the other hand would not work to support the so called
demand for office expansion. Are they expecting London and other areas to provide the workforce? This would push up the congestion on our roads and create a demand for more 'countryside housing' which the borough does not actually need. The local plan should be planning for the local needs of Guildford not Londoners/commuters to Guildford. The fact is many offices are not being filled and our towns’ shops are constantly changing/leaving. The town needs a proper plan to regenerate the community (not offices/shops) so people can live and work in the town.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1109</th>
<th>Respondent: 11041121 / Catherine Dean</th>
<th>Agent:</th>
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</thead>
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I do not agree that the Plan is sound for the following reasons:

- "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
- The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
- The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB’s and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- The draft Plan does not accord with the National Planning Policy Framework (NPPF) policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB’s and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified, together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.

- Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the BREXIT referendum.
- The housing number is at least double the achieved rate of building in the Borough over the last several years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
- Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag behind development and lead to much higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
- The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

Attached documents:

| Comment ID: pslp17q/259 | Respondent: 11041121 / Catherine Dean | Agent: |
Soundness of the Plan – Objection

In my view the Local Plan is not sound. The NPPF states (para 155): “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

- The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council (GBC) to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of our residents.
- The Plan does not consider the implications of Surrey County Council’s (SCC) business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.
- The Plan does not consider the Waverley Borough Council’s approval for the development of 1,800 homes at Dunsfold. This has the potential to feed traffic, which is trying to avoid congestion around Guildford, onto the A247 to access the A3.

Attached documents:

Comment ID: SQLP16/924  Respondent: 11043553 / Geraldine Banks  Agent:

Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
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7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
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14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1667  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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Attached documents:

**Comment ID: SQLP16/333  Respondent: 11045953 / Victoria Palmer  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

I object to building houses at Clockburn Nursery & Garlick's Arch

Attached documents:

**Comment ID: SQLP16/850  Respondent: 11047329 / Hazel Corstin  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()
24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the Green Belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1540  Respondent: 11047873 / Mary Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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Comment ID: SQLP16/1143  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/139</th>
<th>Respondent:</th>
<th>11053825 / Claire Owen</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Answer:** (No)

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3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

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2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
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foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1843  Respondent: 11070113 / Alison Hague  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitment. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
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4. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
5. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secure.
6. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/437  Respondent: 11070113 / Alison Hague  Agent:


Answer: (No)

The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

- The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council (GBC) to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of residents.
- The Plan does not consider the implications of Surrey County Council’s (SCC) business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the already over-burdened A247 through West Clandon.
- The Plan does not consider the Waverley Borough Council’s approval for the development of 1,800 homes at Dunsfold. This has the potential to feed traffic, which is trying to avoid congestion around Guildford, onto the over-burdened A247 to access the A3.
- Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over, i.e. without a height restriction, the Guildford to Waterloo railway, north east of Guildford, which doesn’t involve travelling through the town centre and for this reason it is already busy.
- The A247 may be an A-road on the map but in reality it is a residential road with numerous side-entrances giving access to residential dwellings, commercial properties, and side roads. The changes to the Plan have done nothing to alleviate, and have likely cumulatively increased traffic on the A247, and hence difficulties that will be caused to residents and visitors to West Clandon and its businesses as they seek to turn on to the A247 from the numerous entrances along the road. If traffic on the A247 was to increase substantially, which seems to be the intention behind the Plan, then this has the potential to create serious difficulties for people accessing the A247 from these side-entrances, whether in a vehicle or on foot. The effect of increased traffic both for pedestrians and people in cars wishing to access the A247 from side entrances along the street would be particularly severe in the section of the A247 from Clandon railway station to the crossroads at the A247/A25 junction, because this is a narrow and winding part of the road accessed by many public and private properties with poor sight lines, including the Onslow Arms, West Clandon Church car park, Ashley Park care home, Clandon railway station – all of which have exits with extremely poor sight lines (due to humped back bridge, buildings on the edge of the road and entrances being on the crown of a bend). Numerous other properties along the street have similar issues. This is a problem arising from volume of traffic and insufficient gaps to allow safe egress onto the A247.
• The Plan does not address the difficulties of pedestrians either walking on narrow parts of the A247 where lorries habitually mount the pavement, or for pedestrians wishing to cross the A247 in the village of West Clandon. Since there is no room for a footpath on both sides of the road along a significant portion of the length of the A247 through West Clandon, it is not feasible to address the issue of pedestrians wishing to cross the road by providing pedestrian crossings, which would in any case hold up traffic flow. The narrow and winding nature of the road and poor sight lines particularly in the section of the A247 between Clandon railway station and the crossroads at the A247/A25 junction provide particular difficulties for pedestrians needing to cross the road in this section of the A247. Elderly and disabled residents would become increasingly cut-off and isolated by increasing traffic. In addition to the numerous residential properties that would face increasing difficulties for pedestrian access during longer periods of the day, this would also affect the Onslow Arms pub, Ashley Park care home, West Clandon Church car park and Clandon railway station (when accessed from the south) – all of which are at parts of the A247 with a pavement only on the opposite side of the road. To access these places on foot (the railway station from the south) it is necessary to cross the A247. Again, the village of West Clandon does not and cannot have a footpath on both sides of the street in all sections. There are bends, buildings and a humped back bridge which create poor sight lines in several areas. For these reasons, the additional problems that increased traffic promoted by the amended Plan would cause for pedestrians cannot be addressed by pedestrian crossings, even if multiple crossings were deemed acceptable on an A road. This would leave some residents unable to leave their homes for increasingly long periods during the day.

• The A247 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.

Attached documents:

Comment ID: pslp17q/428  Respondent: 11071553 / Nicholas Roberts  Agent:
Answer: (No)

• The arithmetic behind the housing numbers in the SHMA remains a complete mystery and can’t be tested by either the public or the government because the council refuses to reveal it. The mistakes in the SHMA have been amply explained in at least 2 independent studies which the inspector will have seen, but the SHMA methodology is still taken by the council with a “objective” housing number assessment. This has been lifted wholesale into the plan as a policy proposal, when it is merely part of the evidence base and should be assessed and debated critically and transparently. I suspect this would produce a target about 60% lower than the 12,000+ proposed and would immediately solve a lot of objections about building on the green belt etc. I also don’t think the inspector should trust the figures as a fixed target, given the council’s contradictory noises about how development will be phased and infrastructure and other constraints applied. This leaves the final housing number so up in the air as to render this part of the plan useless as a practical policy tool for officers responsible for day-to-day planning. No-one knows for sure what number the council is heading towards or how this aligns with public opinion or government policy. This cannot be deemed “sound”.

Attached documents:

Comment ID: SQLP16/1472  Respondent: 11074465 / Louise Vaughan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
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14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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**Comment ID:** SQLP16/1019  **Respondent:** 11074561 / Tim Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:**

**24.C. Question 3: Soundness**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
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13. I do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.

14. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances, and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt, can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

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Attached documents:

Comment ID: SQLP16/1657  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate
levels of growth are both inadequate and costly and the net result will be serious debt for many years if not

generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should
be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the
Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the
area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management
Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited
inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for
evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should
now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain
undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered
against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact
been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most
people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and
now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on
previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make
way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after
area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order
to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student
accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build
1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building
student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of
its current building plans and substantially increase the proportion of students on campus. If the University built the
outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding
permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and
infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this
approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need
underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the
methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two
reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both
consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one,
which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in
Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that
the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not
consistent with national policy. The definition of ‘exceptional’ is
forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites
of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely
therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would
fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed’ schemes such as
railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.
Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

Attached documents:

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<th>Respondent:</th>
<th>11104033 / David Dutton</th>
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The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”
1. The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council (GBC) to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of residents.

2. The Plan does not consider the implications of Surrey County Council’s (SCC) business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the already over-burdened A247 through West Clandon.

3. The Plan does not consider the Waverley Borough Council’s approval for the development of 1,800 homes at Dunsfold. This has the potential to feed traffic, which is trying to avoid congestion around Guildford, onto the over-burdened A247 to access the A3.

4. Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over, i.e. without a height restriction, the Guildford to Waterloo railway, north east of Guildford, which doesn’t involve travelling through the town centre and for this reason it is already busy.

5. 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 changes to the Plan have done nothing to alleviate, and the cumulative effects have likely increased, traffic on the A247. 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.

6. Difficulties will be caused to residents and visitors to West Clandon and its businesses as they seek to turn on to the A247 from the numerous entrances along the road. If traffic on the A247 was to increase substantially, which seems to be the intention behind the Plan, then this has the potential to create serious difficulties for people accessing the A247 from these side-entrances, whether in a vehicle or on foot. Between Clandon railway station and the crossroads at the A247/A25 junction there are many public and private properties with poor sight lines, including the Onslow Arms, West Clandon Church car park, Ashley Park care home, Clandon railway station (poor sight lines due to humped back bridge, buildings on the edge of the road and entrances being close to bends). This is a problem arising from volume of traffic and insufficient gaps to allow safe egress onto the A247.

7. The Plan does not address the difficulties of pedestrians either walking on narrow parts of the A247 where lorries habitually mount the pavement, or for pedestrians wishing to cross the A247 in the village of West Clandon. Elderly and disabled residents would become increasingly cut-off and isolated by increasing traffic. There would be increased difficulties for pedestrians accessing the Onslow Arms pub, Ashley Park care home, West Clandon Church car park and Clandon railway station (when accessed from the south) – all of which are at parts of the A247 with a pavement only on the opposite side of the road. To access these places on foot (the railway station from the south) it is necessary to cross the A247. The village of West Clandon does not and cannot have a footpath on both sides of the street in all sections. There are bends, buildings and a humped back bridge which create poor sight lines in several areas. For these reasons, the increased problems for pedestrians cannot be addressed by pedestrian crossings, which would in any case slow down traffic.

Attached documents:

Comment ID: SQLP16/1756  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both
technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome
traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and
Greenfield sites and each of the above points addressed.

Attached documents:

(WYG)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

Refer to the accompanying separate representation submission letter dated 15th July 2016 for details.

Attached documents: 160713 LP1 Representation on behalf of the NRA DRAFT (002) (2).pdf (287 KB)

Comment ID: pslp17q/497  Respondent: 11166497 / CALA Homes (Southern Home Counties)  Agent: Vail
Williams LLP (Jane Terry)


Answer: ()

Soundness
As a consequence, of the discussions above, objection is made to the Plan’s 'Spatial Vision’ and Policy S2: Borough-
wide Strategy, which reduces the delivery of homes from 13,860 to 12,426 in the period up to 2034.

Attached documents:

Comment ID: pslp17q/499  Respondent: 11166497 / CALA Homes (Southern Home Counties)  Agent: Vail
Williams LLP (Jane Terry)


Answer: (No)
MODIFICATIONS SOUGHT TO THE PLAN

The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly the Plan is currently considered to be unsound and the following amendments are sought:

i) The delivery of housing should be reinstated to at least the level set out in the 2016 draft Plan i.e. ‘at least 693 dpa’ but with a further allowance to cover the current shortfall in housing land supply (881 units) plus a 10% buffer to secure flexibility and resilience across the Plan period.

ii) 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

iii) Policy P2: Green Belt

Policy P2 should be amended to recognise the potential that previously developed sites within the Green Belt can make to housing delivery. As such an additional section should be added as follows: ‘Use of Previously Developed Land (7) The redevelopment of previously developed land within the Green Belt is considered to be appropriate provided that it is appropriate to the scale of the locality and has a beneficial impact on the character of the countryside or the local environment in terms of improving the local built fabric.’

Attached documents:

Comment ID: pslp17q/445  Respondent: 11189889 / Taylor Wimpey (South West Thames) Ltd  Agent: Woolf Bond Planning (Steve Brown)


Answer: ()

The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

Effective means the document must be deliverable, flexible and be able to be monitored.

The positive preparation test also requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.

For the reasons set out below there are a number of shortcomings with the plan, as currently drafted, that result in the need for amendment. These amendments relate to the need to increase the level of housing provision; a need to meet existing housing needs in the earlier part of the plan period and acknowledgement that the existing supply of housing commitments are insufficient in both quantum and nature to meet these more immediate needs. These concerns require the need to reconsider the proposed spatial strategy and identify additional allocations within the plan.

As mentioned above, our clients have a controlling interest in land between Normandy and Flexford. The site is available, suitable and deliverable to meet important housing needs in the immediate period of the Local Plan. We remain committed to further engagement with the Council to explore the option of a deliverable allocation on this site, such that it can be incorporated into the final version of the Local Plan.

Attached documents:
4.0 Changes Sought to Plan and Conclusions

4.1 In order for the Plan to be sound the following key changes are required:

1. Revision to the SHMA and the Plan to correct the OAN to 821 dpa reflecting the calculation set out in Section 2 of these representations;

2. Allocation of further smaller sites to address shortfall in provision in the early and middle years of the Plan period arising from the over reliance on a small number of strategic allocations;

3. Removal of stepped trajectory and replacement with a uniform trajectory across the Plan period;

4. Increase in Ash and Tongham allocation to properly reflect its capacity and status as a sustainable location outside of the Green Belt;

5. Removal of proposal for Bridge over the railway at Ash and Tongham;

6. Amendments to other draft allocations as recommendation in Section 2 of these representations; and,

7. Update to SA to properly consider all of the above matters.

4.2 Without the above changes to the Plan the Council has not only created a document that is unsound but also fails in the duty to cooperate and the legal obligations in relation to the SA. The Plan in its current form cannot proceed to Examination.

[Annex 1 Copy of Woking Borough Council’s Matters Statement to Waverley Borough Local Plan EiP – June 2017]

Attached documents:

- DN.Guildford LP Reg 19.Representations on Behalf of Bewley Homes Plc July 2017.FINAL.pdf (166 KB)

Comment ID: SQLP16/377  Respondent: 11992097 / Karen Fryatt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

Lack off evidence for housing need numbers which is more than double the previous figure from in 2012.

there is also a disproportionate level of development in one area of the Borough and there is a real lack of detail regarding the specific details of the essential infrastructure. This includes the need to decision regarding the A3 (widening, extra 4 way intersection, tunnel etc) as well as sewage before, for example Gosden Hill can be ear marked for development

Attached documents:
Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is sound?

No.

To meet the Test of soundness, the independent Planning Inspector is required to consider if the local plan has been positively prepared, is justified and effective and is consistent with national policy. These points are considered below.

Has the plan been positively prepared?

In respect of the policy concerning the Custom and Self Builder we do not feel that the plan has been positively prepared for the following reasons;

It would seem that proposing to allocate some plots solely on the four large strategic sites is restrictive to the Custom Builders’ choice and therefore cannot be considered positive. Many custom builders would like an alternative setting to the plots on offer within the large strategic sites and making these available through a variety of smaller sites would comply with national policy through the NPPF to secure housing choice and would be a positive policy.

The Government is very keen to promote the Custom-build route for the aspiring house owner as it is hoped it will contribute greatly to housing numbers as well as employing many of the smaller builders. The Government have been working closely with a handful of councils (known as vanguard councils) to promote the Custom-build market and it is felt that many of their initiatives will be rolled out across the UK. Many Councils across the country have allocated whole dedicated sites for the Custom-build market.

We therefore do not feel that the draft plan has taken into account the Governments’ clear policy on custom and self-build housing as set required in the Housing and Planning Act 2016, Practice Guidance and the Housing Strategy for England. Chapter 59 of the NPPF states that the SHMA should assess the need for all types of housing for the different groups in the community including people wishing to build their own homes.

The West Surrey Joint SHMAA of Sept 2015 did consider the issue of Custom-build Homes on page 157 however the findings were contradictory and inconclusive and using the information from this source must now be considered out of date when compared to the Councils own Custom and Self Build Register. It is this relatively new register that should be used to inform the Plan through to its final stages.

The Reg. 19 Local Plan Strategy and Sites document now specifically identifies some self-build plots within the strategic development sites but as noted, makes no reference to quantum, monitoring indicator or target leaving it to be resolved at a later date through the strategic sites. This is not considered adequate.

Justified

Again in relation to Custom and Self-build, it is not considered that the Plan represents the most appropriate strategy when considered against reasonable alternatives. As referenced above, we consider that the Plan relies too heavily on the four strategic sites, which in turn rely heavily on central Government infrastructure funding to move forward. The strategic sites will start to come forward towards the end of the Plan period and therefore suitable provision should be made for Custom and Self-build which can be delivered earlier in the Plan period through smaller bespoke sites. A reasonable alternative would be to consider smaller/medium sites as a more appropriate deliverable strategy.

The Greenbelt and Countryside study (GBCS) identified many smaller/medium potential development sites and assessed these against environmental constraints and sustainability criteria The Study scored potential sites and gave them a sustainability ranking intended to assist in reducing the number of traffic movements and is considered the most justified approach in line with the NPPF’s approach to sustainable development.

Parish Councils could understand the logic and when consulted on The Vineyard site (site 41) in Tannery Lane, Send (Site 41) the parish council stated; ‘it is the most sustainably located near to existing shops, schools and public transport.
Sites 56, 57 and 58 are not within easy walking distance of shops and schools in either Send or Ripley and would be certain to generate significant traffic movements.

The Green Belt and Countryside Study also carried out a Green Belt sensitivity analysis on all land parcels across the Borough. This study is considered to be a more subjective study and has come in for considerable criticism in relation to its methodology and conclusions. It is a very broad brush approach which rejects our clients potential development area PDA B16-A village infill site of 5 acres on the basis that the 500acre land parcel it sits in has been subjectively assessed as being highly sensitive. This approach unnecessarily sterilises much of the Borough’s small/medium village infill sites for the length of the plan quite often depending on which side of the road they are.

We consider that the final selection of sites for allocation has given too much weight to the classification of large land parcels to the determinant of sustainability criteria. This has resulted in many of the most sustainably located village extension sites being replaced by sites much further away from local facilities and which will, as a consequence, result in increased traffic congestion which could be otherwise avoided. This could be easily remedied by assessing the most sustainably located village extension sites as to how they perform against the main purposes of the Green Belt.

**Effective**

In relation to the delivery of Custom and Self-build housing, we do not consider the Plan will be effective due to over-reliance for provision through the four main strategic sites which are likely to be delivered towards the end of the Plan period. In order for the plan to be effective in relation to the Duty to meet the demand for Custom and Self-build housing, smaller bespoke sites should be identified and allocated.

**Consistent with national policy**

For the reasons set out above regarding the delivery and sustainability of Custom and Self-build housing, we do not consider the Plan to be consistent with national policy.

**Attached documents:**
Green Belt and Spatial Development Strategy have not been based on giving sufficient weight to meeting the full objectively-assessed need for housing throughout the life of the plan.

Attached documents:

Comment ID: SQLP16/593  Respondent: 14143457 / Hermes Investment Management Limited  Agent: Turley (P Keywood)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

Please refer to the Turley letter dated 18 July 2016 submitted on behalf of Hermes for detailed comments. The letter is uploaded under Question 7 of the Consultation Questionnaire. The letter explains the reasons why it is considered that the plan is not sound and the changes considered necessary to make it sound.

Attached documents:

Comment ID: SQLP16/579  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

The Guildford Vision Group understands that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

Sadly the Guildford Vision Group therefore finds the Local Plan unsound, inadequate and unambitious in respect of the town centre.

Attached documents:

Comment ID: SQLP16/10  Respondent: 15057889 / Katherine Pyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I object. The plan is not justified based on proportional evidence

Attached documents:

Comment ID: SQLP16/34  Respondent: 15067361 / Nicola Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (No)

No, not consistent with national policy - interpretation of the NPPF to allow removal (inset) of land from the green belt is highly questionable and will have permanently damaging consequences for the Surrey countryside.

No, not justified - as commented in question 1, this level of proposed development is inconsistent with the low-side housing demand estimates and encourages excessive development.

**Attached documents:**

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<td>I object because GBC have failed to provide sound evidence in terms of employment land needs assessment 2015 which shows an 80% reduction in employment needs compared with the assessment made in 2013. This means that industrial space at Burnt Common is no longer needed.</td>
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<td>Answer: (No)</td>
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<td>I object. I do not believe the plan to be sound because GBC have failed to provide sound evidence in terms of Employment Land Needs assessment 2015 which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the SHMA may not be accurate. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated.</td>
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<th>Comment ID: SQLP16/49</th>
<th>Respondent: 15081569 / Gary Cable</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<td>Answer: (No)</td>
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<td>I don't believe many parts of the new Local Plan are Sound especially all the last minute amendments. I object to the development at Garlick's Arch for many reasons not the least of which this is Green Belt permanently protected by the NPPF which should prevent the merging of settlements. There is no need for 7000sq m of industrial development based on the latest Employment Land Needs Assessment 2015 where a reduction was shown. If there is a need logic would say add it to Slyfield. The A3, Send and Ripley could not cope with additional traffic generated from 400 + homes plus industrial traffic in this area, it is already congested in rush hour leaving my home on the Send Marsh Estate to drive through Ripley and join the M25. The Portsmouth Road is still used as a &quot;rat run&quot; by A3 traffic leaving the A3 at Burnt Common only to rejoin after Ripley if the A3 is busy. This development can only turn this into a bigger nightmare.</td>
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<td><strong>Attached documents:</strong></td>
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The other land around Send being considered for homes and travellers pitches again were last minute amendments and again are on permanent Green Belt status. I moved from Guildford to this area as I wanted a Country feel to what may well be my final home and Send Marsh was a perfect location between Woking and Guildford where I am close enough for access to both but is still a beautiful countryside location. I object to this being spoilt by building on precious greenbelt!

Attached documents:

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<td>Answer: (Yes)</td>
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<td>I OBJECT to villages being removed from the Green belt. Such villages provide a buffer to the urban developments of Guildford and Woking and importantly provide a valuable buffer against the traffic pollution and noise emanating from the M25 &amp; A3.</td>
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4 WHY THE PLAN IS UNSOUND

4.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

4.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

4.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 500 homes per annum and the housing target after the application of constraints should be in the range of 250 homes per annum and kept under regular review.

4.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.
4.5 The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

4.6 The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

4.7 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

4.8 GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

4.9 GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

4.10 GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.

4.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late!

Attached documents:

Comment ID: pslp17q/90  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent: 
Answer: (No)

1.1 Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

1.2 The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. I believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

1.3 In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

1.4 The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options
that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

1.5 Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

1.6 Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding. The National Planning Policy Framework requires that objectively assessed needs should be met 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.”

1.7 Under this amended policy it is clear that the OAN should be constrained.

1.8 The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

1.9 Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

1.10 The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

1.11 Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late!

Attached documents:

Comment ID: SQLP16/75  Respondent: 15097057 / Jon Machtynger  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (Yes)

This entire plan seems ill-thought out as it applies to the local population. It will fundamentally destroy the nature of the environment, community culture, and quality of life of those who currently live there, and those who you believe will move in.

It's clear that no realistic thought has been invested into how practical it is to bring in so many people. There are simply not enough schools, roads, medical facilities, and land. Firstly, building more schools/roads/hospitals is more easily said than done. Secondly, this will take years to complete. For anyone who has lived next to a single house undergoing renovation for a period of 3-6 months, this will pale into insignificance to a 2-5 year project (and that is just the houses).
That doesn't reflect the traffic, degradation of roads/services, and increase in crime. Assuming that a supposed increase in resources were also provided, this would be an additional 5-10 year project, which would need funding and complete commitment from the existing community. The prevalence of flooding across the country shows that building on flood planes is unsound, and has knock-on consequences across the board. We already experience flooding here (every few years), but it is likely to be exacerbated as a direct result of this project.

From every so-called consultation I have seen, there is a clear demand from the population to avoid this taking place. We seem to be in a position where no matter how much we object, we are asked again and again until we simply tire of it, or miss out on an opportunity to respond in a timely fashion. This is undemocratic, and a terrible reflection of the contempt being shown to the community and due process.

I understand that there is a need for more residential properties in the UK, but this location is far from ideal, and the cost paid by each resident here far outweighs the benefit achieved by new houses. Success for those moving in, is not having a place to stay, but a viable residential and familial experience. Those being promised houses here, are not going to experience what the village currently does. That community will no longer be. This is a false promise, a false economy and disingenuously being used to drive a financial agenda, not a social one.

The additional fact that green belt land is being used to support this suggests that there are now few boundaries being respected. This doesn't bode well for any organisation that is expected to honour rules and regulations in the future. What hope do we have when we've already stretched the definition of compliance? Destroying large areas of protected land will impact on wild-life, air quality, and psychological health. It also impacts on the council’s ability to represent themselves with any sense of credibility. Despite every comment being made, there seems to be a polite nod, but no respecting the opinions and demands offered.

This whole process has little credibility and seems highly indefensible

Attached documents:

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**Comment ID:** SQLP16/610  **Respondent:** 15098945 / ALISON TURNER  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (No)

The basis is not sound, consideration has not been given to the adverse impact on our historical villages. Send is in the Green belt therefore making the proposals unsound and unlawful.

**Attached documents:**

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**Comment ID:** SQLP16/105  **Respondent:** 15102657 / Nicholas Butler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

My question is, "Why does your own planning committee not adhere to the aims of your own plan?" I refer specifically to a previous planning application 10/P/01451 whereby the planning committee agreed that it was important to retain existing employment land and furthermore to maintain distance between employment land and residential areas. Of course local residents thought that this was the right decision. However, later on, planning applications 14/P/01028 and 14/P/01029 called for two detached houses to be built within two metres of an industrial workshop and courtyard area. The planning committee saw fit to pass these applications and thereby go against their previous decision and against numerous points raised in your own local plan: 1/ Loss of existing employment land. 2/ Failure to provide land for new
start-up businesses 3/ Your own plan states that it is important to retain land for manufacturing. The land that has been lost in this planning application has never been residential. It has been industrial since the second world war.

So, what is the point of having a local plan if your planning committee follows their own agenda?

Attached documents:

Comment ID: SQLP16/120  Respondent: 15108065 / Claire Cable  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (Yes)

I object

Attached documents:

Comment ID: SQLP16/133  Respondent: 15110177 / GORDON TURNER  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

I Object as No real consultation has taken place

Attached documents:

Comment ID: SQLP16/136  Respondent: 15110721 / Stuart Reeves  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (Yes)

I do not consider the strategy as a whole to be sound. GBC have failed to provide sound evidence of the employment land needs assessment 2015 which showed a reduction in employment space. This means that the number of houses required has been exaggerated.

Attached documents:

Comment ID: SQLP16/142  Respondent: 15113505 / Moorad Choudhry  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

I write in reference to the above to register my strongest possible objection to it, on two grounds.

In the first instance the plan is fundamentally undemocratic with respect to something as significant as changes to boundaries. The ability of the local area to influence its own affairs, particularly regards decisions that would affect residents, will be much reduced.
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<td>I object, this is not sould to build on our greenbelt when there are other brown areas that can be used.</td>
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<td>I object because the land to the west of Wind Ridge and Send Hill has not been consulted previously and has just been added in.</td>
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<td>I object. The areas surrounding the A44 development will be negatively impacted by the developments that are proposed. This is a new proposal and was not included in Regulation 18 and has not been consulted on. The subsoil has been proven to contain documented unsafe landfill and should not be disturbed.</td>
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<td>i object due to there being no GBC transport assessment being available to the councilors for the vote taken on the 24th May as it was published on 6th June. Therefore infrastructure overload has had little attention.</td>
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I would like to object to planned building of 700 homes per year, the area of Send does not have sufficient infrastructure to support this type of expansion. There are insufficient schools, road and transport system. Will destroy the village and its uniqueness, turn the whole are into a massive Conurbation.

The process which this has been proposed contravenes not only planning commitment and guidance as laid down by the government for green belt, but also has ignored due process.

I object to further development for the following reasons. With advent of the UK exit from the EU, the prediction for the requirement for housing and development of commercial units will need to be revised downwards. As the 3 million EU citizens currently in the UK, will be affected by this current event, and their ability to stay in this country will also be affected. So your estimates for further development of housing are wildly exaggerated and need to be revised downwards.

In addition to the potential down grade in the economy due to Brexit, your estimation for commercial and housing development is wildly exaggerated and unnecessary. Given you have allowed development of send marina; I really don’t understand how you can commit to further commercial developments. So therefore this development is folly this area does not need.

In particular, I want to object to all the following points:

I object to Garlicks Arch development of green belt land which contravenes government guide lines and that due process was not followed in the introduction of this development into this plan, and did not follow this process. Its inclusion in this plan was included at the last stage and did not follow process. So for that reason should be excluded.

I object to the council changing the enclosure of green belt land round the Ripley and Send villages, changing of village boundaries to allow for future development.

I object to the wholesale destruction of green belt land in this area (including development of 2000 homes at Gosden hill farm, Merrow, and also Send and Ripley), which contravenes directly the government stated commitment to preservation to green belt land.

I object to the creation of new north and South Bounds slips ways from the A3 to the A247clandon Road (policy A243) at Burnt common, as in light of the wholly unnecessary due to planned expansion which unlikely be needed within the 10 years.

Attached documents:
For the Plan to comply with the test of soundness it must be:

- 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.

We do not consider the Plan will be effective in delivering the required housing growth in line with the needs of the Borough. This is because:

- There is over reliance of a few very large strategic sites;
- Effective joint working has not been demonstrated with neighbouring authorities on cross boundary strategic priorities including the need for Guildford to deliver additional housing where those authorities are more heavily constrained;

Attached documents:

Comment ID: SQLP16/275  Respondent: 15177793 / V Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (Yes)

I object to the lack of detailed consideration given to consequences of the effect on the flood meadows next to Clay Lane. By building close it will cause immediate water run-off to the meadows and the flood risk is increased dramatically. The meadows already flood during summer months and in winter the water floods across Clay Lane causing traffic build up. If large vehicles require direct access the Slyfield Industrial Estate then additional and closer on and off roads must be provided to the A3 without disturbing the already congested local roads.

Attached documents:

Comment ID: SQLP16/277  Respondent: 15180193 / Paul Bedworth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (Yes)

I object to the proposal on the basis that it is not sound. It does not make sense to have a plan that effectively merges all villages along the A3 from Wisley to Blackwell Farm. In order to make it sound, very significant infrastructure improvements would need to be made, including, but not restricted to, completely rebuilding the A3/M25 intersection to make it more free flowing and an additional lane to be added to the M25 in either direction. The A3 through Guildford would need to become 3 lane, and, the intersection with the Hogs Back A31 significantly improved.

Attached documents:

Comment ID: SQLP16/1198  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent:
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</th>
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<td>The strategy put forward in respect of housing delivery and the Green Belt is inadequate. Please refer to letter dated 8th July 2016 for further detail.</td>
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<th>Comment ID: SQLP16/287  Respondent: 15199009 / Alan Toomey  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td>Answer: (Yes)</td>
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<td>With so many houses and developments planned - it will no longer be a village. The amount of houses is too large for a small village. Traffic will be a major issue - its already bad. Doctors and dentists and other services will not cope.</td>
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<th>Comment ID: SQLP16/491  Respondent: 15216129 / Timothy Hewlett  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td>Answer: (Yes)</td>
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<td>The plan is wholly unsound, it should be scrapped and a proper national plan be created for housing needs before any proposals are made fat local level for development.</td>
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<th>Comment ID: pslp17q/417  Respondent: 15227617 / James Pask  Agent:</th>
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<td>I object to the proposed Submission Local Plan. The document contains a significant number of inaccuracies and, as a result, cannot be relied upon. By way of example, the housing need number (which in any event appears to be incorrect) lacks any evidence in support. Statements are made without any supporting documentation being available. In addition, I object to Paragraph 22 of the Submission Local Plan which in my view clearly doesn’t reflect the impact of the buildings on the surrounding area. The constraints on the site and its physical location mean that this site remains the least sustainable strategic site identified in both this version and in previous versions of the plan.</td>
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<td>Comment ID: SQLP16/307</td>
<td>Respondent: 15233025 / Wey Estates Ltd (Michael Hamburger)</td>
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<td>Answer:</td>
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<td>The plan is unsound since it does not make sufficient provision for suitable employment land</td>
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<th>Comment ID: SQLP16/311</th>
<th>Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)</th>
<th>Agent:</th>
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<td>Answer:</td>
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<td>The strategy is sound because the local area needs to develop housing and transport infrastructure to ensure ongoing growth and prosperity.</td>
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<td>The provision of key worker housing is a major issue for the hospital as is transport access. Our staff have to travel significant distances to be able to work at the hospital so these are major retention issues.</td>
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<td>The area around the University and the Research Park has inadequate transport and car parking infrastructure which causes patient, visitor and staff issues. This requires upgrading as it has not really changed for 15 years despite ongoing growth over this period.</td>
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<th>Comment ID: SQLP16/353</th>
<th>Respondent: 15241313 / Christine Relf</th>
<th>Agent:</th>
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<td>The traffic through the village are a rat run from Woking to A3 and M25 the traffic is at a stand still every morning and we are unable to go out.</td>
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<th>Comment ID: SQLP16/359</th>
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<td>This will cause more traffic impacting already over used roads.</td>
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<td>Comment ID: SQLP16/367</td>
<td>Respondent: 15241729 / Mark Brackley</td>
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<td>I do not agree the proposed submission is sound. The infrastructure can not cope with the current load, roads are narrow, speeds are increasing on the roads due to the village been used as a cut through.</td>
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<th>Comment ID: SQLP16/370</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td>Answer: (No)</td>
<td></td>
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<tr>
<td>The argument that a high school is needed in the area is not valid as the only reason we would need one is due to an influx of residents at one time such as a whole new development of houses. The village is great the way it is and you are going to negatively impact our way of life by bringing in so many new people at once.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/541</th>
<th>Respondent: 15244097 / Persimmon Homes (Craig Hatton)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td>Answer: (No)</td>
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<td>For those reasons set out previously we do not believe that the plan as proposed is sound. Whilst the concept within A30 of a road bridge, is a sound one, it is obvious that the evidence base supporting both its identification and indeed location are fundamentally flawed.</td>
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<tr>
<td>A more appropriate approach would see the complete delivery of land east of Foreman Road for residential development, with land being safeguarded for the delivery of a pedestrian crossing. The road bridge could then be delivered more appropriately within the major development area. This would allow units to be delivered early within the plan period, which as has been shown previously is much needed and more importantly, will allow the delivery of a new bridge, which has been designed properly, is deliverable, appropriate and capable of serving not only existing residents, but also future ones.</td>
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<td>It is not considered that the new rail bridge is required at this time, as the vehicle queues at the existing level crossing clear between the time that the barriers are down and as already determined by SCC the crossing would still operate within capacity even in 2031 with the addition of the LP sites.</td>
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<td>It is however considered reasonable that there is a long-term desire to close the level crossing and provide a bridge over the railway line. It is indeed Network Rail policy to close level crossings wherever possible, in order to improve pedestrian safety and reduce rail related accidents.</td>
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<td>If it is accepted that the level crossing should be closed and an overbridge provided in the long-term, it is considered that there is a more suitable location for the new bridge. It is considered that the bridge should be located further southeast. This would then sit across the land between the A323 and the Policy A29 land boundary and within the latter itself.</td>
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<td>This has a number of benefits, most notably there would be more land for the road alignment to be designed to allow for sufficient forward visibility, both in the vertical and horizontal planes.</td>
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</table>
There is also the potential for a new comprehensive link road to be established between the A323 Guildford Road, through the ‘Land to South and East of Ash and Tongham’ site, to South Lane. This link road would then continue through the ‘Land South of Ash Lodge Drive’ site, as per their planning permission, to Manor Road.

The northern end of the link road could realign Guildford Road into the ‘Land to South and East of Ash and Tongham’ site, which could then provide the new bridge within land under this site’s control. This could also have the benefit of enabling the parcel of land to the north of the railway line (and west of the new road) to realise a car park or drop-off area for Ash Railway Station.

The new bridge over the railway line could also be designed to have less environmental impact, than the current proposed alignment, as it could be fully designed into the proposed 1,200 residential unit development. The spine road, south of the railway line, would connect south to South Lane and also connect to Foreman Road thus giving alternative routeing options for both development and through traffic.

The principle of a new railway bridge to come forward in the long-term alongside the closing of the level crossing is accepted; however, it has been demonstrated that this is not required in the short-term.

Furthermore, it is considered that in order to realise a suitable design, and thus implementation, a revised alignment would be needed. A more suitable and achievable location for the bridge, and the alignment of the A323 either side of the bridge, would be for it to align through the Policy A29 site. This could enable the bridge to be designed in accordance with DMRB standards with suitable forward visibility achieved.

Attached documents:

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**Comment ID:** SQLP16/2019  **Respondent:** 15256225 / Boyer (Michelle Thomson)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

Plan Making – Tests of Soundness

3.14 The four tests of soundness against which a Local Plan will be examined by an Inspector are set out in paragraph 182 of the NPPF.

3.15 In order to be considered sound, a Local Plan should be;

- ‘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 properties; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.’

Attached documents:

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**Comment ID:** pslp17q/155  **Respondent:** 15266273 / Danescroft Land Ltd Danescroft Send LLP  **Agent:** Pegasus Group (Mike Spurgeon)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness
The up-to-date evidence in relation to Objectively Assessed Need for housing within the Borough suggests that the annual requirement for dwelling provision (adjusted to reflect constraints and policy considerations) is 654 dwellings per annum. This has been reduced from 693 dwellings per annum in the previous iteration of the plan. There is some concern that the previous record of under-delivery in the Borough (reflected in the latest completion rates of 381 and 297 dwellings per annum in 2015/16 and 2016/17 respectively), will not be addressed by planning for a lower number of dwellings per annum. This would exacerbate the well-documented issues of housing affordability and the ability to deliver key areas of the overall strategy.

Furthermore, the use of the lower figure does not take into account the duty to plan for meeting unmet housing need in adjoining Boroughs or Districts. This is illustrated by the shortfall of 225 dwellings per annum in Woking between the level of housing being planned for (292 dwellings per annum), and the OAN for the Borough. It is therefore considered that the position set out in submissions to the current Waverley Local Plan (Part 1) Examination by the Home Builders Federation1 (HBF), that more land needs to be released in Waverley and Guildford in order to accommodate the unmet need in Woking.

While the general upward revision of the capacity of key development sites in Guildford is supported, we are concerned that planning for a lower level of dwelling provision in the Borough than was previously (as recently as June 2016), considered a suitable basis for strategic planning, would cause the document as a whole to be considered unsound. It is therefore considered that the Council should revert to the target rate of dwelling provision set out in the Strategy and Sites Local Plan (2016), which equated to a rate of 693 dwellings per annum. Rather than seeking to allocate additional land, further critical examination of the capacity of sites considered suitable for development would be able to account for a substantial increase in dwelling provision.


Comment ID: SQLP16/556  Respondent: 15266785 / Trenfold Property Limited and Countryside Properties Limited  Agent: Boyer (Michelle Thomson)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  Answer: (No)

Please see report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited for further details.

Attached documents:

Comment ID: SQLP16/416  Respondent: 15266977 / Gordon Phillips  Agent: Neonova Design (Mark Brett-Warburton)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  Answer: (Yes)

We consider the current spatial distribution of housing is over-reliant on major strategic sites and that some additional smaller sites in the locations identified would improve delivery and avoid under-supply in the event that the strategic sites do not come forward on time, or, are proved to be not viable.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/419</th>
<th>Respondent: 15267521 / Land Owner of Hornhatch Farm</th>
<th>Agent: Scott Brownrigg Planning (Natalie Walter)</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<tr>
<td>Answer: ()</td>
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<td>The strategy put forward in respect of housing delivery and the Green Belt is inadequate. Please refer to letter dated 8th July 2016 for further detail.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/438</th>
<th>Respondent: 15272321 / Danny Skillman</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<tr>
<td>Answer: (Yes)</td>
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<td>The plan lacks soundness as it fails to demonstrate need for housing, need for green belt development and need for retail space increase.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/446</th>
<th>Respondent: 15273057 / steve sage</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<td>the transport infrastructure is already inadequate. I do not believe that a gap town such as Guildford can ever have the road and transport infrastructure to support a 25% increase in population</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/456</th>
<th>Respondent: 15273697 / Ray Briggs</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<tr>
<td>Answer: (No)</td>
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<tr>
<td>The local plan is not sound for 3 reasons:</td>
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<tr>
<td>13000 plus home in 20 year is too great a burden to be put on the local area.</td>
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<td>The loss of green belt land is not acceptable. The whittling away of this land is a variance with a policy to maintain the green belt and as such is not in the best interests of the borough or the country</td>
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<tr>
<td>The transport infrastructure plan is vague in the extreme. There is no clarity about what will be done, only vague indications. This borough is already at crisis point with respect to transport and the provision of 13000 new homes at or close to the A3 will lead to severe congestion that will affect the ability to deliver on the commercial aspects of the plan. In short the plan is fatally flawed and will not work.</td>
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<td>Attached documents:</td>
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<tr>
<td>Comment ID: SQLP16/474</td>
<td>Respondent: 15274145 / Brian Medhurst</td>
<td>Agent:</td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td><strong>Answer:</strong> ()</td>
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I do not consider the sites and strategy is sound. I do not believe Guildford and the surrounding villages need any more loss of green field sites, in fact I would argue that some of the existing developments should never have happened. In my view Fairlands estate should not have been built, because it has created a seemingly overwhelming need amongst planners to infill the green space between Fairlands and the rest of Guildford with more development. This pattern has happened around the large Sainsburys at Burpham, and is happening around the royal surrey hospital/university. What starts as a remote development gets infilled and the conurbation expands. We have to decide on a point where we say Guildford is big enough, I believe we have already passed that point. You only have to try driving around Guildford at rush hour to realize that. Unfortunately I don't foresee us bulldozing large areas of housing and returning it to countryside. I like the semi rural nature of the villages surrounding Guildford I don't want them made bigger and eventually absorbed into one big town. I believe the Green belt should be kept and adhered to.

Another aspect of the strategy I don't agree with is the inclusion of traveller pitches alongside virtually every development. [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]

**Attached documents:**

<table>
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<tr>
<th>Comment ID: SQLP16/480</th>
<th>Respondent: 15274465 / Marco De Magalhaes</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td><strong>Answer:</strong> (No)</td>
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</table>

The scale of development, particularly on Green Belt

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/484</th>
<th>Respondent: 15274561 / Thomas Davies</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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The plan is not sound as it does not consider the full impact on residents of Onslow Village of the combination of the Blackwell Farm development and the A3 widening.

It is also not sound as it does not consider the impact of the Blackwell farm development on the character of the Hog's Back Area of Outstanding Natural Beauty. It is also not sound because it makes insufficient, inadequate and inappropriate provision for traffic and will worsen the A3 issues identified in the Guildford Borough Transport Strategy 2016.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/497</th>
<th>Respondent: 15274913 / Simon Osborn</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td><strong>Answer:</strong> (No)</td>
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</table>
No, I do not consider the plan to be sound. It appears to be a statement of desperation to meet wholly unrealistic imposed from central government that are wholly unsuited to the Guildford area. I am a Surrey resident who is a frequent visitor for leisure and recreational purposes to many of the areas that will be affected by this plan I walk on Ockham and Wisley heaths and enjoy the scenery and wildlife, I go birdwatching on Papercourt meadows and on Bookham Common, I go for country walks around Send, Ripley, Wisley and Ockham. I have been on Surrey Wildlife Trust evening walks on Ockham heath. With my family we visit Ripley, Wisley and Ockham for shopping, eating and drinking and regularly frequent many of the National Trust properties such as Hatchlands and country pubs such as the Queens Head in East Clandon and the Black Swan in Ockham and restaurants and pubs in Ripley. I therefore spend a lot of money in this area and support local businesses and employment. To me this area has a special rural character that must be preserved when so much in Surrey has been lost. I want my children to enjoy this too.

I am staggered by the scale of many of these proposed housing developments on what are wholly inappropriate rural and Green Belt sites. Even a small number of these developments would completely destroy the character of these villages and surrounding countryside. I am talking particularly about the proposed developments for Ripley, Send, West Horsley, Clandon Ockham and Wisley. The Green Belt and Countryside Study seems to take as a fait accompli that much of the green belt should be built on without proper consideration of alternatives. The draft plan fails properly to consider how brownfield sites could be developed. It fails to realise that the rural character of areas like Ripley, Send and Ockham are an asset to the county that will be destroyed by the developments it is prepared to sanction. The council is failing also to take account of its responsibilities to protect wildlife. Surrey has a large proportion of the UK's remaining lowland heathland, 80% of which has already been lost. The council should be working to preserve this, not destroy it, and to restore what has been destroyed. It should be seeking to place housing developments in areas with strong train and bus links: yet 2000 homes could be built at Wisley far from train stations and bus routes. This matters for the quality of life of residents and visitors, not for wildlife. On the fringes of London there is huge demand for quality, attractive green space that benefits humans and wildlife.

In particular, I urge the Council to remove the following sites from the strategic plan as wholly inappropriate in scale and siting given the Green Belt and rural character of the following areas which I visit regularly:

- Site A35 - the former Wisley airfield. To put this development here would be a wanton and inexcusable act of destruction, unjustifiable on social, economic or environmental grounds.
- Sites A37, A38, A39, A40, A41, A42 and A43

Yet this draft plan does not present a vision of a sustainable future that will preserve the quality of life of Guildford residents or visitors. It appears a forced exercise to comply with national targets, spurred by greedy developers working for short term financial gain. I urge the borough council to stand above this and amend the plan to remove Green Belt and rural areas from development that we would all come to regret. This plan is not a forward-looking, sustainable vision but a blueprint for local desecration driven by national targets that fail to take heed of what matters on the ground to local people. I am disappointed that the council does not appear to recognise that the rural character of Send, Ripley, Horsley, Clandon and Ockham is special, worth protecting and important to many local residents and visitors. There are also important wildlife sites in these areas that would be adversely impacted by this developments that would be nails in the coffin for Surrey countryside. But it is not too late to make important amendments. I urge the council to have the courage to stand up for what is right, resist pressure from Westminster and make significant amendments to remove many of these rural housing developments from the draft plan. This is essential to protect our future quality of life and to protect the Surrey countryside and wildlife.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/498</th>
<th>Respondent:</th>
<th>15275009 / Compton Parish Council (Fiona Curtis)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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We object

The plan is not so much positively prepared as avariciously prepared. We do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

We believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Green Belt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worpleston, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford's need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.
Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.
GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

We understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. We consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. We ask why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

Please refer to files uploaded for question 2

Attached documents: Site 26 BWF Annex 4.pdf (456 KB)
70. The Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2017 is unsound for the following reasons, which are additional to those we reported in July 2016:

(1) The Plan is not consistent with national policy, in the following respect:
  – Policies ID2 and A26 particularly would cause substantial deterioration in air quality in Compton, where air quality monitoring shows that NO2 pollution is already (and has persistently been) in breach of legal limits, by attracting additional vehicular traffic through the village to access both the A3 and Blackwell Farm/Surrey Research Park via a new road link from the A31: this is in breach of NPPF paragraph 109 policy for “preventing both new and existing development from contributing to…. unacceptable levels of…. air…. pollution”.

(2) The Plan will not be effective, in the following respects:
  – Policy ID2 is unlikely to be deliverable within the Plan period in respect of widening the A3 through Guildford, which is a precondition for implementing Policy A26. Even if it was, it would not meet its own objective of providing appropriate access to the strategic road network to accommodate future planned growth in the form of the Blackwell Farm development – by virtue of generating congestion rather than alleviating it.
  – Policy A26 will not be effective because the volume of traffic the proposed Blackwell Farm development would generate on Egerton Road (even if a link road to the A31 is also in place) would cause levels of congestion so high that the network flow would break down in this area, and the Plan proposes no remedy for this.
  – Policy A26 will not be effective because the Plan has failed to identify a means of access from Blackwell Farm onto Egerton Road (Infrastructure Requirement (1)), even though this access has been upgraded in the Plan and is no longer ‘secondary’ to the link to the A31; the 1:10,000 plan accompanying the Policy shows no link at all into Guildford.
  – Policy A26 will not be effective because Infrastructure Requirement (3) for a controlled road link through the Blackwell Farm development to limit the users of the road will not be implementable in practice.
  – Policy A26 will not be effective because the additional road capacity needed to serve the newly proposed secondary school (Allocation item (9)) within the development has not been provided in the Plan and the road network in the area is already modelled to be well over-capacity when Blackwell Farm is developed.
  – Policy ID3(3) on developments having regard to the Sustainable Movement Corridor will not be effective in its western section, because either the modal shift will not be pursued vigorously enough to make a significant difference (which appears to be the Local Plan’s preferred strategy), or, if applied with determination (such as by reducing private vehicle lanes in the A3 underpass from four lanes to two) could not be expected by itself to change driver behaviour significantly; in either case the result would be greater congestion on the local road network than it could take after the development of Blackwell Farm.

(3) The Plan is not justified, in the following respects:
  – Policy S2 relies on the completion of the widening of the A3 in sufficient time for the proposed numbers of dwellings to be constructed before the end of the Plan period, but this cannot be a justified proposal because there is no certainty at all that the A3 widening will be completed by 2027, if ever; given the difficulty of finding alternative locations likely not to be dependent on capacity increases on the A3, the most appropriate strategy would be to abandon Policy A26.
  – Policy A26 would cause the generation of so much traffic (both by itself and by the construction of the A3 without which Policy A26 cannot be implemented) that the local road network could not possibly cope with it, and documents supporting the Plan acknowledge that local roads would be put seriously over-capacity: such an arrangement cannot reasonably be the most appropriate strategy and the Plan is therefore not justified.

Attached documents:

**Comment ID:** SQLP16/509  **Respondent:** 15275041 / Cora Dennis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (No)

I object.
This site is not required, it is GREENBELT and you can not build on it.

An assessment carried out by the ELNA show that industrial space is not needed.

You have exaggerated (lied) regarding population growth these houses are not needed, not wanted. The effect upon traffic, schools, doctors, pollution would be disastrous and all to make a profit for greedy people, Ripley and Send are villages stop trying to take our villages away build on brown field sites

Attached documents:

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**Comment ID:** SLP16/505  **Respondent:** 15275073 / Sean Lightfoote  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (No)

I object on the basis that there are brownfield sites that should be being developed. There is no sound argument that the greenbelt land should be destroyed for additional housing when there are alternative locations that can be developed.

Attached documents:

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**Comment ID:** SLP16/532  **Respondent:** 15278369 / Ripley Parish Council (Jim Morris)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (No)

See comments in attached report. The Plan is not sound. It is fundamentally flawed in the scale and distribution of housing land. It does not provide a basis for sustainable development to meet the key requirement of the Guildford Borough Plan area. It is likely that significant parts of the Plan will not be deliverable. It overprovides for housing delivery and as a result would lead to permanent environmental degradation, intensification of traffic and use of infrastructure, and irreversible damage to the rural landscape and heritage assets and social isolation.

Attached documents: Report on Guildford LP Reg 19 (V4) FINAL 17.7.16.pdf (489 KB)

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**Comment ID:** SLP16/2014  **Respondent:** 15278369 / Ripley Parish Council (Jim Morris)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

8. The meaning of the term “sound” is explained in the National Planning Policy Framework at paragraph 182:

“182 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.”

9. RPC has concluded that, without modification, the Plan cannot be considered “sound” within the meaning of Section 20 of the 2004 Act and paragraph 182 of the NPPF.

Attached documents:

Comment ID: SQLP16/632  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

The test of soundness requires the plan to be:

1. Positively prepared - in so far as it should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of development;
2. Justified - in that it should present the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
3. Effective - it should be deliverable over the plan period (in this case by 2033) and be based on effective joint working on cross-boundary strategic priorities; and
4. Consistent with national policy - in that the policies should enable the delivery of sustainable development in accordance with the policies that comprise the development plan framework.

These representations question the housing and infrastructure strategy in circumstances where the two are interlinked. Indeed, paragraph 4.6.16 of the plan confirms:

*The implementation of the three RIS (Road Infrastructure Strategy) schemes during the Plan period, alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough. It is therefore important that the developers of proposal sites adjacent to the A3 and M25 and other large sites work closely with Highways England to ensure that their layout and access arrangement(s) are consistent with Highways England’s emerging schemes.*

Miller consider the plan is NOT sound in so far as:

1. The housing numbers for the plan period are at the lower end of the OAN.
2. The housing strategy is overly dependent upon the Strategic Housing sites with no realistic fall back should they fail to be delivered.
3. The plan is back-loaded in that the greater proportion of the planned housing will come forward toward the end of the plan period.
4. The strategic sites are 'critically' dependent upon infrastructure improvements, notably highways, for which the Borough Council, the County Council and Highways England have yet to agree. In this regard the Plan:
   1. fails to identify what improvements are necessary.
   2. fails to demonstrate whether strategic highway improvements can deal with the cumulative impact of the strategic sites.
   3. fails to satisfactorily demonstrate how the local highways network can cope in advance and during the construction of the strategic highway improvements and
4. has not demonstrated that the improvements are deliverable in the timescales identified for the delivery of housing.

5. The proposals for the planned 'Strategic Movements Corridor' are at best in their infancy. Whilst they nod to sustainability in prioritising bus, cycle and pedestrian priority, the routes are already heavily congested and would need significant widening if the stated objectives are to be achieved.

   1. The programming of these works and the delivery of the Road Infrastructure Improvements has not been confirmed. It is not known how, or whether, the existing demands on the strategic and local highway network can be accommodated whilst these major improvements are undertaken.

In light of the above, Miller is of the opinion that the Council is extremely unlikely to deliver the OAN, and that in reality delivery will slip into the next plan period.

Furthermore, given the significant costs associated with the critical infrastructure improvements (not just highways) required to bring forward the principal strategic sites it is considered that their viability will be under extreme pressure which in turn will affect their ability to deliver the target of 40% affordable homes.

For the above reasons, in relation to housing and infrastructure provision, the Plan is considered to lack clarity and the evidence required to demonstrate that the strategy will be able to meet the needs of the Borough. It is therefore the conclusion of Miller that the Plan fundamentally fails the tests of soundness identified above.

Attached documents:

**Comment ID:** pslp17q/225  **Respondent:** 15280737 / Miller Developments (David Milloy)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Answer:** (No)

Despite our previous objections as to the over reliance on the Council’s proposed strategic allocations we note that GBC has maintained this strategy albeit reduced the capacity of each of these large allocations to reflect its reduced housing target. We note also that the Council has indicated that the delivery of these sites is to be phased to come forward during the latter period of the plan to coincide with the infrastructure improvements (mainly highways) that will be necessary to facilitate the development of these sites. Whilst the Council has now indicated the likely improvements that will be necessary along the A3 corridor it has failed to indicate satisfactorily whether these improvements will provide the necessary highway capacity and how this will be funded. They have also not detailed how these various improvements would affect the functioning of this strategic road which remains one of the principal arterial routes to the south coast. Prolonged improvements to the operation of the A3 will also severely hamper the economic performance of Guildford town centre which will also be affected by other road improvements that are targeted at bus and cycle priority. There is every likelihood that these various infrastructure improvements will be delayed due to phasing requirements or a potential lack of funding (central funding or through developer funding).

We therefore remain concerned therefore that the Council’s ability to deliver its strategic allocations (even though these have been reduced in scale) will result in the abject failure of the Council to meet its 'Objectively Assessed Need', in particular we consider the Council has adopted a very short term approach to the future economic performance of the Borough which appear to be; based on judgements that appear specific to Guildford and do not appear to be consistent with any national advice as to a sustained downturn in performance over the whole of the Plan period.

We are, as a consequence of the above, concerned that the Council will fall further and further behind its housing delivery target in circumstances where it has consistently been unable to identify a five year housing land supply. Currently the Council is only able to identify just over two years' supply with its own estimates suggest that it will be many years into the Plan period before historic shortfalls can be made up. This is to be achieved with limited reliance on the strategic allocations which are not expected to contribute until 2022/23 at the earliest. In reality, no sooner than the Council has addressed historic shortfalls the strategic allocations will stall and supply will again fall off.

In summary, we believe the plan to be unsound because the Council has:
1. Failed to adequately justify its revised economic projections.
2. Failed to justify it revised housing figure which we do not consider have been objectively assessed.
3. Not consulted adequately with the neighbouring authorities and in particular has not updated its projections in light of the Inspector's finding in relation to the Waverley Plan nor has it responded to the recent changes to the Woking Plan which is relying on a site at New Zealand Golf Course to meet a significant proposition of it needs (this site is considered unavailable by the site owners).
4. Not adequately demonstrated it can identify a five year housing land supply. Whilst it is suggested that any shortfall in this regard can be addressed by the middle of the plan period this does not satisfy current housing needs (which are supposed to be objectively assessed and addressed). Furthermore, there is a real concern that the current shortfalls will be repeated when the strategic allocations fail to come forward as planned.
5. Failed to provide a detailed explanation as to the impact of the strategic and local highway improvements and how these will be funded; in circumstances where these are needed to be delivered in advance of houses being brought forward.

Attached documents:

Comment ID: SQLP16/575  Respondent: 15281857 / Jon Dobinson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (Yes)

The proposals in the plan are flawed as they do not take sufficient account of the need for new local infrastructure to support the massive building programme planned for West Horsley, wisely and the surrounding villages. To shoehorn huge numbers of people into an area that lacks sufficient transport infrastructure, schools and health facilities to cope is to severely damage quality of life both for existing residents and those hoping to move to the area. Worse, it gives rise to serious safety concerns. There are already many very dangerous roads and crossings throughout the Horsleys, Effingham, and Ockham, such as the junction between Old Lane and Forest Road where pedestrians cross to reach Effingham Station, plus many narrow lanes which are frequented by many cyclists and walkers reaching paintball facilities (I saw women with prams walking in the carriageway on the section of Forest Road road without a pavement last week, dodging traffic). The plan as outlined will put thousands more cars, walkers and cyclists on these roads, which will beyond doubt result in serious injuries and deaths. The road network linking these developments with shops, town centres and transport hubs is inadequate and options for increasing its safety and capacity are limited: certainly the measures in this plan are derisory and cannot conceivably cope with the additional numbers involved. There will also be a significant impact on air pollution in high traffic areas near the M25 and A3 where pollution levels are already either breaching legal limits, or are in danger of doing so: this is a growing concern throughout London and the South East, with airport expansion likely to increase the problem, and I can't see evidence that rigorous studies have been carried out to assess the additional impact of the new planned developments on areas where there are potential air quality issues. Currently, monitoring seems limited at best. As a local resident, I speak for many when I urge the council to focus on fixing existing problems before it charges headlong to create new ones. I am not opposed to development: I want to see affordable homes here for my children and for others who want to enjoy all that the area can offer, but a plan which threatens the health, well-being and quality of life of all those who live here, benefits neither today's residents nor those who might like to leave here in future. The names of those who forced through such a plan should be preserved, so that future generations do not forget the vandals who destroyed the safe, green and pleasant environment that they might otherwise have inherited.

Attached documents:

Comment ID: SQLP16/586  Respondent: 15282241 / Elena Papazoglou  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: (No)
This land is greenbelt and not part of urban sprawl. I object to any building on land that was classified as GreenBelt

Attached documents:

**Comment ID:** SQLP16/615  **Respondent:** 15282593 / Anne Young  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (No)

Still the same old same old. Lets cram more people in without considered approach and implemition of infrastructure that works. This proposed local plan is not sustainable in my opinion.

Attached documents:

**Comment ID:** SQLP16/1648  **Respondent:** 15299201 / Samira Abdullah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

*I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.*

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? *The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.*

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.
A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford's need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot buy into this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.
GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.
The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

Attached documents:

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**Comment ID:** SQLP16/658  **Respondent:** 15304929 / Rosemary Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. **'Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.’** Summer 2016 edition of •About Guildford’ (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road i National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt

   Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council's The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.
12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.
13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.
14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
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Comment ID: SQLP16/817  Respondent: 15368993 / Tessa Spink  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()
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5. QUESTION 3: Soundness

We do not consider the Proposed Submission Local Plan: strategy and sites 2016 to be sound as it relates to site A46 and the need for a secondary school to be located at that site. Our reasoning is given above, and furthermore we do not believe it conforms to the National Policy Planning Framework guidance for soundness. We make our comments below the guidance notes of the NPPF (which are in italics).

To be sound, a plan should be:

- **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;

Our comment: The strategy to justify a secondary school at site A46 has not been objectively assessed. The justification made in the LR:ER, SED3 and Evidence Base is subjective and does not draw in specifically from the SCC and other
neighbouring county councils that provision education. The siting of an 8FE new school in a development that only
directly feeds in 1FE and is in a sparsely populated area of the Borough is not sustainable according to SCC education
guidelines. Therefore the site A46 plan is not positively prepared.

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable
alternatives, based on proportionate evidence;

**Our comment:** The evidence base presented for siting of a new secondary school on a red area of greenbelt shows that the
plan is not the most appropriate strategy, and in fact shows that a secondary school at A46 is not required. It is the least
appropriate strategy from a site selection basis. If the housing and school provisioning requirements ultimately show need
for new secondary schools the more reasonable alternatives would be to provide any new schools at Wisley and Gosden
Hill as 6FE schools to meet SCC sustainability guidelines.

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-
boundary strategic priorities; and

**Our comment:** The evidence base does not even show how the school at site A46 is deliverable. It makes an estimated
capital cost of £22m with no justification of the cost or how it is to be funded apart from a comment of “developer
contributions”. Similarly the designs and costs for associated infrastructure are mere “thumb sucks” and vague “funded
by developer” comments. There is no evidence within the draft Local Plan of effective joint working on cross-border
strategic priorities with regards to this matter. Therefore the plan is not effective.

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance
with the policies in the Framework.

**Our Comment:** The plan does not enable the delivery of sustainable development from the perspective of education
(which is not even considered in the SA), infrastructure, road transport, environment and habitats and most importantly
the conflicts with the wishes of the communities at Normandy and Flexford.

Attached documents:

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14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
24.A. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

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Attached documents:

**Comment ID:** SQLP16/865 **Respondent:** 15381249 / Helen Poyntz **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

**24.C. Question 3: Soundness**
Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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Comment ID: SQLP16/874  Respondent: 15386017 / Gareth Sinnett  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
Answer: ()  
24.C.Question 3: Soundness  
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ANSWER

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The draft Plan should be reassessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/878  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

* why you consider it is or is not sound and
* what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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Attached documents:

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**Comment ID:** SQLP16/883  **Respondent:** 15388673 / Bruce Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

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**ANSWER**

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<th>Respondent: 15389697 / Oliver Stewart</th>
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/911  Respondent: 15390401 / William Stewart  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:
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2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/651  Respondent: 15391585 / Ann Watson  Agent:
Answer: (No)
I re-iterate that this plan is UNSOUND

Attached documents:

Comment ID: SQLP16/919  Respondent: 15398657 / Kim Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

20.A. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

**Comment ID:** SQLP16/946  **Respondent:** 15405857 / Raymond Mackay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

**24.C. Question 3: Soundness**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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24.C. Question 3: Soundness

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15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/973</th>
<th>Respondent: 15420833 / Marjorie Moss</th>
<th>Agent:</th>
</tr>
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</table>

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green " Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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12. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

1. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

2. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

3. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis

5. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

6. The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council very little.

Attached documents:
24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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Comment ID: SQLP16/983  Respondent: 15425025 / Cornelius Johann Jeronimus  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
Answer: ()

No evidence is given how to integrate a large influx of new houses and residents within the local village area. Within the available infrastructure road/rail/parking/school capacities are insufficient also part of our Ockham road North/South road spaces are too narrow for the safe passage of trucks/busses also the arch of the railway bridge is too narrow to allow 2 large trucks to pass at the same time. Furthermore it will knock out a large part of our green belt spaces.

Attached documents:

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Comment ID: SQLP16/998  Respondent: 15426305 / I C Dean  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
Answer: ()

Question 3: Soundness. I do not agree that the Plan is sound for the following reasons:
The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

The draft Plan does not accord with the NPPF policies on protecting the Green Belt. The housing number has been used to justify removing numerous sites from the Green Belt amounting to 65% of the proposed housing number. Exceptional circumstances need to be shown site by site to justify removing them from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statement.

The assumptions made in calculating the OAN are now almost certainly incorrect following the referendum.

There is no evidence in the Plan to show that the proposed rate of building is achievable and sustainable. The housing number is at least twice the achieved rate of building in the Borough over the last few years.

The Infrastructure Plan is very weak. Much of the desired provision is not committed and/or is outwith the Council’s control. It seems very clear that infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

The NPPF states that Councils cannot impose conditions which make development non-viable. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

1. The many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land have been ignored in the main. There is no evidence of a collective vision on green belt. In my area more land is being taken from the green belt.

2. There is no hard information available on any future plans for alleviating congestion on the A3 between the M25 and the town in spite of this being acknowledged as one of the major causes of public discontent. Residents are not able to know what the future holds.

3. There is no recognition of the cumulative impacts of the concentration of development in the north east of the town centre all of which will generate traffic on the A247:

- Gosden Hill
- Slyfield
- Garlick’s Arch
- Burnt Common

Attached documents:

Comment ID: pslp17q/256  Respondent: 15426305 / I C Dean  Agent:


Answer: (No)
- Wisley
- 4-way junction near Send/Burnt Common
- slip roads to the A3 off the A247
- diverting traffic from the south to go around and not through Guildford

1. The Plan does not consider the implications of Surrey County Council’s business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1007</th>
<th>Respondent: 15427617 / Ken Scotland</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
</tr>
<tr>
<td><strong>Answer:</strong></td>
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20.A. Question 3: Soundness

"Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the "

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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The draft Plan should be re-assessed with housing on brownfield sites given priority over commercial development and greenfield sites and each of the above points addressed.

Attached documents:
Comment ID: SQLP16/1003  Respondent: 15427745 / Barry Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I believe the plan is unsound, unsustainable and lacks credibility given (a) the lack of attention to the infrastructure required to 'support' the plan and (b) the very significant impact the Plan would have on the local community in particular New Inn Lane.

Attached documents:

Comment ID: SQLP16/1012  Respondent: 15430753 / Nick Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

- It is seriously flawed and as such is unsound.

This plan is not yet ready for an inspector

Attached documents:

Comment ID: SQLP16/1024  Respondent: 15433793 / Jennifer Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I object to Guildford borough Council's draft Local Plan June 2016 on the grounds that is it unsustainable and based on unsound data.;insufficient consulting periods and flawed data have been used to come up with the Local plan, it is therefore UNSOUND.

Attached documents:

Comment ID: SQLP16/1076  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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Attached documents:

Comment ID: SQLP16/1077  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1091  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24.C.Question 3: Soundness

"Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case. "

Section page number  Page 305 of 400  Document page number 760
ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green ” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.

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5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
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4. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy, a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites given priority over commercial development and greenfield sites and each of the above points addressed.

Attached documents:

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Comment ID: SQLP16/1100  Respondent: 15446273 / Jane Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (Yes)

N/A

Attached documents:

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Comment ID: SQLP16/1123  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

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**Attached documents:**

---

**Comment ID:** SQLP16/1124  
**Respondent:** 15448353 / Emily Roberts  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

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Attached documents:

Comment ID: SQLP16/1125  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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Attached documents:

Comment ID: SQLP16/1127  Respondent: 15448449 / Carol Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1172</th>
<th>Respondent: 15458081 / K C Meldrum</th>
<th>Agent:</th>
</tr>
</thead>
</table>
I object to this policy as it is unsound since it contains no town centre masterplan and because too much space has been allocated for retail use that could be used for housing.

Attached documents:

**Comment ID:** SQLP16/1952  **Respondent:** 15460737 / Donna Collinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

**GRA Comment:** It is unsound and unsustainable to develop on the scale proposed. The overall housing target (13,860 new homes) and 40% increase in retail space should be reduced to take account of the constraints of our gap town and growth in online retailing. Opportunities to provide greater accommodation on campus for university students, to provide more homes as part of the North Street development, to plan the river corridor achieving flood risk betterment, to promote sustainable commuting and to open up access across the railway for our physically divided town have not been considered positively.

We do not consider that the proposed housing target of 693 homes a year is soundly based, notwithstanding the intention that this should be skewed to later in the Plan period or the aspiration that this should be linked to timely delivery of infrastructure. We are also concerned that a target of “about 695” homes a year and a focus on strategic sites in the Green Belt were suggested very early in the Plan-making process and we would be concerned if the Plan had been prepared around these working assumptions.

**Green Belt and Sustainability**

The Council’s case set out in the Green Belt and Countryside Topic Paper paragraph 4,62, is as follows: “We consider that in general terms there are exceptional circumstances that justify the amending of Green Belt boundaries in accordance with the NPPF, paragraph 83. Our evidence base identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns. Each addition or removal to the Green Belt is also separately considered above and in the Housing Delivery topic paper.”

We do not accept this assessment.

- The NMSS SHMA review indicates that the evidence base exaggerates the level of housing need and that the employment housing need assessment is flawed. Increasing housing supply beyond the level suggested by the demographic OAN would not have a discernible effect on affordability but simply mean more people who can afford high prices moving to the area.
- We submit that the economic need should be tested on a sector by sector basis and that the priority given to retail expansion should be questioned.
- Suitable deliverable alternatives, such as significantly increasing campus accommodation, thereby freeing up homes in the town, and provision of more homes on North Street in lieu of a 40% increase in retail, have not been pursued.
- Options for meeting revised need in larger settlements beyond the outer Green Belt boundary linked to sustainable transport have not been fully explored.
- The option of not fully meeting needs in recognition of constraints, including Green Belt, has not been balanced against the positive and negative consequences of fully meeting need (as revised) as should happen in a meaningful Sustainability Appraisal that takes account of environmental capacity.
- Commuting by sustainable means, especially in the context of the current high levels of inward- and outward-commuting, should not be dismissed as an unsustainable option in all the circumstances.
• It would be irresponsible and unsustainable to use up all potential least-worst, last resort Green Belt sites within one plan period.
• High-added-value, knowledge-based businesses and homes should be given priority over expansion in retail land.

Constraints

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and sewer flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. High rise buildings would be inappropriate due to the important contribution views and the rise and fall of the land make to both urban and rural character, including the nationally significant Surrey Hills AONB. The river and railway divide the town and there are too few crossing points; a further constraint. Air quality and traffic noise are not insignificant considerations in some locations.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GRA considers it would be harmful to rural, suburban and urban character, quality of life and the economy of Guildford not to reduce the new housing units delivered by 2033 to a number significantly below 13,860. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

Transport infrastructure is also a constraint. Current congestion is severe by any meaningful definition and there is a backlog of infrastructure investment. Assessment of the very late and incomplete transport evidence by expert, Richard Jarvis, using the information made available to date, indicates that the overall effect of completing the proposed schemes and development in the Plan would be congestion to a level that makes it hard to conclude that the test in paragraph 32 of the NPPF is passed. See extract below and Appendix 2. Any notion that building 13,860 homes is going to deliver infrastructure that will overcome Guildford’s traffic problems seems misguided.

“The cumulative effect of the additional traffic generated by the developments in the proposed submission local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF.”

“The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the proposed submission local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic (47% more than in 2009), for which they are unsuitable. “

In view of the extent of physical constraints, protective designations and congestion, it is likely that even a more accurate, lower OAN housing target would need to be constrained.

We submit that Guildford BC should:

• revise the SHMA to make corrections and to better account for student need
• undertake a proper assessment of constraints, informed by a strategic Green Belt review and a Sustainability Appraisal that tests environmental capacity and considers meaningful alternatives to establish an appropriate balance between adverse effects and fully meeting (revised) need
• test the transport evidence that should inform the plan and which points to congestion.
Any housing figure adopted in the context of considerable uncertainty would need to be kept under regular review.

If any land releases were deemed necessary following a rigorous, strategic and accountable approach to Green Belt review, these should be measured and paced, arising from a robust assessment of the balance between benefits and adverse effects, taking full account of environmental capacity.

Guildford has not currently provided the evidence to derive a housing figure arising from such a process. It is notable that Woking has proposed constraining its OAN by 50%.

In Guildford, if one uses a revised OAN of 10,200 over 20 years (510pa) and assumes no Green Belt development and that 50% of need can be met through positive initiatives in the town, this results in a target of 255 [check] homes pa which would be below the previous target of 322pa. This reinforces the extent to which Guildford is constrained. This would be broadly consistent with the urban capacity assessment undertaken for the last Surrey Structure Plan and with the concern about the risk of town cramming in Guildford identified in the SE Plan.

If one uses a revised OAN of 10,200 over 20 years (510pa) and assumes 20% of all last-resort Green Belt land is released to development in each of the next three Plan periods, this results in a target of 340pa [check] for the current 20 year Plan period.

More strategic solutions, such as development beyond the Green Belt linked to sustainable commuting or a tunnel for the A3, are required now. They cannot be left until the next Plan period as proposed.

**Neglected Opportunities**

A more sound and sustainable approach to planning positively in Guildford should include greater emphasis on the following:

- **Campus accommodation:**

  Higher priority should be given to providing attractive campus accommodation so a very high proportion of university students will want to live on campus thereby freeing up affordable homes in the town. Significantly, this could deliver homes within the challenging first five year period of the Plan.

  There has been some late progress towards meeting the modest 60% student accommodation target agreed in the previous Plan as a result of residents expressing concern at the lack of progress in meeting the undertakings in the previous 2003 Plan. However, the opportunity to increase significantly the proportion of university students attracted to live on campus has not been pursued. Neither nostalgia by decision makers for student days spent living in shared houses in the town, nor eagerness by the University to support a case for development on Blackwell Farm, should deflect attention from the opportunity to free up homes in the town for use by others. Nor is it adequate to reject the possibility of increasing campus accommodation by saying the percentage is at the higher end compared with other tertiary institutions or to be sceptical about uptake and funding. We need to plan positively to find sustainable ways to sustain a thriving university in a constrained, commuter belt gap town.

  Appendix 3 provides more information on the opportunity.

- **Flood risk:**

  Higher priority should be given to work on integrating flood risk management and development in the town centre. The 2014 Draft Local Plan failed to include a Flood Risk policy and was not informed by a flood risk sequential test or Level 2 Strategic Flood risk Assessment. Subsequent application of the necessary tests has resulted in some residential allocations being removed and some zone 3 non-residential allocation proposed under the exception test.

  Overall, progress has been painfully slow in planning positively along the river corridor in a way that achieves flood risk betterment and also enhances the natural and built environment. Time was lost with a first iteration Town Centre Master
Plan that paid insufficient attention to the significant flood risk. The margin required for climate change reinforces the importance of factoring in flood risk and moving away from the old approach of seeking to justify development in even the functional zone 3 floodplain.

- **Sustainable commuting:**

Far more attention should be given to the potential for enabling sustainable commuting recognising that Guildford has a high-value-added economy in a constrained gap town. Rather than destroying the qualities that underpin the town’s economic success by overdeveloping, the scope for making it easy and affordable to commute by sustainable means from less constrained settlements should be pursued as a priority, both for the short and long term.

The context is that levels of both inward and outward commuting are extremely high. Almost half the working population commutes out to work and almost half of the workforce commutes in. In many households, occupants work in different locations and people do not necessarily move when they change jobs. In 2001, more people commuted out to Rushmoor than vice versa and more commuted by from Waverley than vice versa.

In a Guildford context, the aspiration that more people should live where they work needs to be balanced with other sustainability considerations.

- **All-direction, central bus interchange:**

Failure to identify a central location, and to allocate appropriate land, for an attractive all-direction bus interchange in the town is a grave failing that undermines the soundness of the Plan and should be addressed as a matter of urgency. A central interchange is needed to view levels of congestion, the gradients involved in town centre journeys, the limited options for crossing the railway and river, and the need to provide sustainable transport options to support complex commuting and travel patterns.

- **Town centre plan:**

Better progress, and a more joined up approach, in town centre planning is required. The slow pace has meant opportunities for coordinated brownfield development are not available as part of this Plan. The need to have brought forward town centre options in a timely way should have been foreseen. Guildford had already used up its green field sites within its Green Belt boundary by the time of the 2003 Local Plan.

It is a problem that Guildford BC has chosen to tackle the town centre after the Plan via an Area Action Plan in which it intends to incorporate Scenario 2 from the A&MI/Arup proposals that will reduce highway capacity in the centre. This prevents joined up planning. For example, the Plan should face up to implications of constraints being applied to roads such as the A281, A31 and A322.

- **New cross-town road bridge:**

An additional bridge over the river and railway is required to improve connections across the railways and river for our physically divided town. We want to see the townscape improved, with better use of the river. Achieving this, while maintaining accessibility, will be much easier with a new crossing.

Sustainable Choices

Given the scarcity of land arising from being a constrained gap town, the Plan should consider a wider range of sustainable strategies than simply expanding across the board.

- **Balance between retail expansion and town centre homes**

The Plan should weigh the case for a 40% increase in retail space, especially given trends in internet shopping, with the opportunity to provide accessible and sustainable town centre homes. Increased town centre housing provision for the elderly could also have the beneficial knock-on effect of freeing up existing family homes. All types of town centre housing would help support the evening economy.
The wisdom of such massive retail expansion, on top of already generous retail provision, needs to be challenged in view of the fate of the High Street in many places. The mix of homes and retail, with its relatively low added-value, in the North Street development should be reconsidered. Residents were dismayed that the Bellerby theatre site was used for yet another supermarket rather than primarily homes.

- **Balance between high-value-added, knowledge-based economy and retail expansion**

Similarly, the mix between land allocated to the high-value-added, knowledge-based economy in the town and to retail expansion should be carefully reviewed. Knowledge-based enterprises yield returns between 3 and 4 times greater than retail.

**Planning ahead**

In order to deliver sustainable development, it is important to plan ahead. Sites for entrances and, in the shorter term construction areas, for an A3 tunnel through Guildford should be safeguarded.

**Attached documents:**

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**Comment ID:** pslp17q/501  **Respondent:** 15460737 / Donna Collinson  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness  
**Answer:** (No)

**Q3 Soundness**

1. In terms of its transport aspects the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.

**Attached documents:**

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**Comment ID:** SQLP16/1195  **Respondent:** 15464673 / Trudy Grey  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
**Answer:** ()

20.A. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case

**ANSWER**
I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page
   1. This is demonstrably untrue and appears designed to bias the consultation process. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
1. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
2. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
3. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
4. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18
5. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involving These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
6. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
7. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
8. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

1. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured
2. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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Comment ID: SQLP16/1207  Respondent: 1546613 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:
1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been made.

23. The status of the text which accompanies each policy box is not clear.

If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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Comment ID: SQLP16/1220  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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Attached documents:

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Comment ID: SQLP16/1242  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SLP16/1760  Respondent: 15478209 / Sally Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

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Attached documents:

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Comment ID: pslp17q/150  Respondent: 15487841 / National Federation of Gypsy Liaison Gro (A. R. Yarwood)  
Agent: 

Answer: (No)  

We consider the plan to be unsound, non-compliant with National policy and it will not be effective in meeting the needs of Gypsies and Travellers. 

Some of the allocated sites are only temporary and some limited to particular occupants. These cannot therefore be regarded as fulfilling the long term need for Traveller sites.

There is a complete absence of any policy guidance to deal with applications which are received for new Traveller pitches. PPTS requires that Local Plans must provide policy guidance to deal with applications which come forward where there is no identified need.

Attached documents:

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Comment ID: SQLP16/1896  Respondent: 15501217 / Luke Sarti  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
Answer: ()  

I OBJECT to the 2016 local plan in its current format. I do not believe that it is sound and is not yet fit for implementation.

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I am writing to object to the 2016 Draft Local Plan on the grounds of (i) the limited consultation period and (ii) it appears to be unsound in a number of key aspects.

On reviewing the document it appears the plan is unsound because there is a lack of evidence for the alleged housing need which in turn has led to the proposed disproportionate level of development on one area of the Borough.

Additionally, there is a lack of specific detail concerning the essential infrastructure to support all the proposed development stated in the above Draft Plan especially as there is an acknowledged existing deficit already.

Furthermore, there appears to be a total disregard for the potential loss of Green Belt.

Therefore, as a result of the poor quality of the draft plan it appears to be total unsound for it’s proposed purpose and so should be re-considered and drafted.

Attached documents:

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Comment ID: SQLP16/1714  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
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4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
I object that the Plan is not sound. It appears to be based on a wholesale annexation of the green belt, a flawed if not illegal strategy, and is clearly not deliverable in the timescales of the plan when compared with the typical rate of development in the last 10-20 Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced and impracticable.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1406</th>
<th>Respondent: 15571617 / Bruce Garbutt</th>
<th>Agent:</th>
</tr>
</thead>
</table>

**Question 3: Soundness. I do not agree** that the Plan is sound for the following reasons:

- “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
- The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
- The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB’s and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- The draft Plan does not accord with the National Planning Policy Framework (NPPF) policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB’s and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified, together with the harm to the Green Belt. Only if there are exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.
- Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the BREXIT referendum.
- The housing number is at least double the achieved rate of building in the Borough over the last several years. There is no evidence in the Plan that this rate is achievable and sustainable.
- Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag behind development and lead to much higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
- The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

Attached documents:

| Comment ID: SQLP16/1395 | Respondent: 15571937 / S Bennell | Agent: |
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councilors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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Comment ID: SQLP16/1414  Respondent: 15575457 / Pauline Johnson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I write now to register my strong opposition to the plan as it is currently framed, as I do not believe the strategy and sites as a whole to be sound. The lack of practical detail regarding important infrastructures, such as roads, traffic flow and increased sewerage and water provision, indicates that the plan has not been positively prepared, and as such is not justified and consequently cannot be effective; it therefore does not meet GBC’s own overall aspirations and thereby fails the Duty to Cooperate.

Attached documents:

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Comment ID: SQLP16/1427  Respondent: 15579457 / RSPB South East Office (Heather Richards)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

No. The RSPB considers that the proposed submission local plan is not sound. We consider that there are problems with 3 of the tests of soundness. We do not consider that the plan is justified, in particular we do not consider that the inclusion of Wisley Airfield as a new settlement represents the most appropriate strategy when considered against reasonable alternatives. We do not consider that the Wisley Airfield aspect of the plan is deliverable, particularly as a scheme very similar to that proposed in the Plan has recently been refused by the Council on a number of grounds which are unlikely to resolvable, and that consequently the plan is not effective: in particular, the reliance upon this particular site to provide 14.4% of the Borough’s 2033 housing figure places the delivery of the overall housing target at risk. We also note that
national policy (in particular paragraphs 117 to 119 of the National Planning Policy Framework) highlight the importance of ensuring effective protection of internationally important wildlife sites through the local plan process but consider that the inclusion of the Wisley Airfield proposal runs counter to that policy direction, meaning that the plan is not consistent with national policy. We expand on these points in our comments on Policy A35: Land at former Wisley airfield, Ockham below.

In order to make the plan sound the proposed Wisley Airfield site allocation (and its associated references) needs to be removed from the plan. This will make the plan consistent with national policy by respecting the policy and legislative safeguards accorded to the Thames Basin Heaths Special Protection Area, remove uncertainties about the delivery of a large proportion of the housing, and remove an inappropriate settlement proposal from the plan.

Attached documents:

Comment ID: SQLP16/1449  Respondent: 15581665 / Laura Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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**Attached documents:**

**Comment ID:** SQLP16/1451  **Respondent:** 15581761 / Peter Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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Attached documents:

Comment ID: SQLP16/1467  Respondent: 15582593 / Dermot McMullan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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<tr>
<th>Comment ID: SQLP16/1476</th>
<th>Respondent: 15583169 / Poul Jensen</th>
<th>Agent:</th>
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2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: SQLP16/1491  Respondent: 15584161 / Alexandra Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

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Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

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3. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

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11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
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The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

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I do not consider the Proposed Submission Local Plan: strategy and sites “as a whole” to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars and there is no indication that Network Rail has any intention whatsoever of building a station at this

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy

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Attached documents:

**Comment ID:** SQLP16/1517  **Respondent:** 15585601 / Sophie Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness  
**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “*Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.*” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
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Attached documents:

Comment ID: SQLP16/1523  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? **The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.**

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the
outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot ‘buy into’ this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in PRE Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant ‘yet to be discussed’ schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

**It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.**

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the
development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as ‘South West Guildford Urban’ is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included ‘significant changes’ according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to
residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

Attached documents:

**Comment ID:** SQLP16/1555 **Respondent:** 15588929 / Alex Hutchings **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
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Attached documents:

Comment ID: SQLP16/1578  Respondent: 15590273 / Eunja Madge  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

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Attached documents:

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Comment ID: SQLP16/1637  Respondent: 15601057 / Chris Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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Attached documents:

**Comment ID:** SQLP16/1658  **Respondent:** 15602177 / Julia Hunt  **Agent:**

| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness |
| Answer: () |

**I object**

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.
I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term 'exceptional'?
The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.
I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

**Attached documents:**

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<tr>
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<th>Respondent: 15603489 / Simon Pitt</th>
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**Comment ID:** SQLP16/1682  **Respondent:** 15604289 / Lesley Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:**

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5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through
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20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
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23. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

Attached documents:

Comment ID: SQLP16/1686  Respondent: 15607553 / Penelope Gillmore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer:  (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

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Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

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No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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Comment ID: SQLP16/1690  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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Attached documents:

**Comment ID:** SQLP16/1724  **Respondent:** 15615745 / Nicholas Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

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<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1733</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
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Attached documents:

Comment ID: SQLP16/1732  Respondent: 15618337 / Matthew Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Answer: ()

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1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.
Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**Attached documents:**

---

**Comment ID:** SQLP16/1739  **Respondent:** 15619073 / Paul Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** (Yes)

**COMMENT:** We broadly support the strategy set out within Policy S2 with regard to the delivery of development to meet the needs of the Borough over the plan period and note the fact that Policy S2 explains that the targets set out for each year of the plan post-adoption are not a ceiling, thus emphasising that these are minimum requirements and that delivery in excess of these targets is supported.

However, having regard to the supporting text to the policy and the housing trajectory set out in the 2016 Land Availability Assessment, it is evident that the plan currently anticipates that much of the delivery will occur in the later years of the plan period, when infrastructure delivery will facilitate large-scale allocations to be brought forward and that a number of smaller deliverable housing sites (i.e. sites which are available now, offer a suitable location for development now, and are achievable with a realistic prospect that housing will be delivered on the site within five years (2018 – 23)) are being allocated in the plan on the basis that they are developable sites (i.e. developable in years 2022 – 2028).

Having regard to historical under delivery in the Borough and the National Planning Policy Framework’s (NPPF) emphasis on significantly boosting the supply of housing as soon as possible, it is imperative that any opportunities to deliver identified residential sites early in the plan period are maximised in order to minimise the adverse socio-economic impacts associated with an under-supply of housing.

Therefore it is considered that to be considered sound the Plan needs to illustrate and demonstrate which of the proposed allocated sites are considered deliverable (as opposed to developable) and will be expected to deliver the full range of housing necessary to demonstrate and maintain a five-year supply of housing land to meet the housing target from the base date of 2018.

Early delivery of those sites which are deliverable and relatively unconstrained should be particularly welcomed and expedited in light of the low rates of delivery in the first years of the plan period, in order to reduce the cumulative deficit against the housing requirements.

**Attached documents:**

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**Comment ID:** SQLP16/1745  **Respondent:** 15623745 / Stella May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

I object
The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot ‘buy into’ this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.
Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant ‘yet to be discussed’ schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.
GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

Attached documents:
The Plan is unsound and unsustainable.

The Plan is not ready for an inspector.

I do not agree that the Plan is sound for the following reasons:

• “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

• The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

• The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB’s and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

• The draft Plan does not accord with the National Planning Policy Framework (NPPF) policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB’s and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified, together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.

• Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the BREXIT referendum.

• The housing number is at least double the achieved rate of building in the Borough over the last several years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

• Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag behind development and lead to much higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

• The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
Whilst we support the Council’s intention in seeking to meet its objectively assessed housing need, we believe that further modifications are required before the plan can be found sound. The fact that the housing numbers are heavily ‘back loaded’ causes concerns that the immediate significant shortfall in the housing land supply is not addressed and that a five year housing supply is unlikely to be achieved which is a requirement of the adopted plan. The reliance on bringing key items of infrastructure forward for a significant proportion of identified sites poses a risk on supply coming forward early in the plan period at a sustained rate and does not allow for choice or competition within the market.

There also appears to be several inconsistencies within the spatial strategy and between comparable sites that have been allocated and those that have not. The plan needs to identify more sites that are deliverable in years 1-5 of the plan period.

Attached documents:

**Soundness**

It is therefore our view that the Council’s approach to education planning in the Proposed Submission Local Plan is fundamentally unsound, for the following reasons.

*Failure to positively plan for education needs, including the needs of existing schools.*

The Proposed Submission Local Plan and accompanying documents undertake a very high-level assessment of the need for school places but do not undertake any proper analysis of the timing of requirements or a proper matching of the location and nature of demand for places. Moreover, the only specific references to the Howard of Effingham School, and its ability to meet needs, in the appendix to the LAA (2016), are factually incorrect.

There is an existing shortfall of education capacity and the most recent School Organisation Plan (2015/16 to 2024/25) identifies rising demand for secondary school (Year 7) places across that period. As we have noted above, the Council suggests that none of the strategic sites hosting schools are likely to commence before 2020/21, and secondary schools typically take 18 months to two years to build. In addition, the process of setting up a new school tends to be a much more protracted and costly process than expanding an existing school.

The Council has not engaged positively with Howard of Effingham School as part of the Local Plan process to address either its capacity to meet either current or future needs. The Proposed Submission Local Plan is entirely silent on how current schools can be expanded or altered.

*Failure to demonstrate that the approach to school delivery is appropriate against reasonable alternatives*

Planning to meet education needs is an important priority for the Government, and should be undertaken in partnership with schools themselves in accordance with clear principles established in national policy. In this stage of the Local Plan process, the Council has deleted three allocations and replaced them with entirely new allocations with no direct consultation with a Multi-Academy Trust that operates its main school on one of the originally allocated sites.

The ‘RAG’ approach used to justify allocations in the LAA (2016) and the Sustainability Appraisal is superficial and does not properly consider any of the detailed issues which need to be addressed in identifying the appropriateness of sites for schools. The assessment of sites appears to be based on qualitative statements with limited explanation as to why previously allocated sites have been removed. The proposed allocated site at Normandy and Flexford has the same level of Green Belt ‘sensitivity’ as the Effingham site and yet an exception has been made.

*Failure to demonstrate deliverability (effectiveness) of allocated schools and sites*
Appendix C of the Proposed Submission Local Plan, which sets out the detail of school site allocations, provides very little information on how schools might be delivered. It identifies broad school sizes (in forms of entry), but provides no timing of delivery and no identified delivery partner other than an ‘academy’ or ‘academy partnership’. The wording is exactly the same for each allocation. The section on funding is equally limited with assumptions that developers will provide land for free and fund the full build costs.

In contrast, the proposed expansion of Howard of Effingham has a deliverable approach, which could happen in the early years of the Plan, with a specifically identified site, an identified, experienced and successful Multi Academy Trust to operate the school and an identified delivery partner and funding mechanism.

Neither the Plan nor its supporting documents refer to the very significant challenges faced in opening a new school from scratch in a new strategic development, or the issues around cost, and quality of the range of opportunities which small four form of entry (4FE) secondary schools face. Two of the proposed three schools could be 4FE.

**Conclusion**

The previous Draft Local Plan (2014) allocated Howard of Effingham School, Effingham Lodge Farm and Brown’s Field (Site Allocation 69) to provide an expanded school together with enabling development for new homes. This allocation has been removed in the Proposed Submission Local Plan but in our view remains an appropriate, deliverable and sustainable means of meeting education needs in this part of the Borough.

The Howard Partnership Trust is keen to work constructively with the Borough Council to bring the Effingham site forward and would be happy to discuss any of the above points in more detail.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1915</th>
<th>Respondent: 15670785 / Mr and Mrs Poulsom</th>
<th>Agent: Vail Williams LLP (Jane Terry)</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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No.

We do not consider that the proposed Plan is sound as a whole in relation to the designation of new Green Belt and the implications this has for housing delivery both within the Borough and in meeting any unmet needs of neighbouring districts. In this respect, the Plan is not consistent with national policy; has not been positively prepared; is not justified and will not be effective in meeting objectively assessed needs.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1944</th>
<th>Respondent: 15679137 / Turley (Hannah Bowler)</th>
<th>Agent:</th>
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Please see supporting report for more details

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Insofar as it relates to 'The Barn, Effingham' site. Please refer to the accompanying separate representation submission report dated July 2016 for details.

**Attached documents:** [The Barn Effingham- Local Plan Reps (2).pdf](attachment://The%20Barn%20Effingham-%20Local%20Plan%20Reps%20(2).pdf) (426 KB)

<table>
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<tr>
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*I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.*

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GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot ‘buy into’ this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant ‘yet to be discussed’ schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green Belt is on the
same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.
No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2106</th>
<th>Respondent: 15724353 / Arvnid Parmar</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td><strong>Answer:</strong> ()</td>
</tr>
</tbody>
</table>

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

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10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

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**Comment ID:** SQLP16/2127  **Respondent:** 15733665 / Vortal Properties Ltd  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Answer:** ()

**QUESTION 2 AND 3: LEGAL COMPLIANCE AND SOUNDNESS**
As a whole our client considers that the Local Plan may be deemed to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.

As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).

In particular our client has concerns regarding the cumulative impact of; Affordable Homes (Policy H2); Policy D1 (Making Better Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published)

The wider conformity with National guidance is considered individually below in our responses to individual policies.

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Answer: ()

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The wider conformity with National guidance is considered individually below in our responses to individual policies.

Attached documents:

Comment ID: pslp17q/239  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:


Answer: (No)

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. We believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site. In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the
Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

Under newly amended para 4.1.4 It is stated that ”Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will betaken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESCRIPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Direcstives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.

The National Planning Policy Framework requires that objectively assessed needs should be met 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.” Under this amended policy it is clear that the OAN should be constrained. The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/1</th>
<th>Respondent: 17070913 / Green Reach Limited (Matthew Estwick)</th>
<th>Agent: Obsidian Strategic (Philip Scott)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answer: ()</td>
<td>We consider that the PSLP is sound providing that proposed housing in the Horsleys and other location impacted by the Thames Basin Heaths Special Protection area is adequately mitigated through the provision of additional SANG land (as evidenced in the Habitats Regulations Assessment.</td>
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</tbody>
</table>
Soundness

The RSPB considers that the proposed submission local plan is not sound. We consider that there are problems with 3 of the tests of soundness. We do not consider that the plan is justified, in particular we do not consider that the inclusion of Wisley Airfield as a new settlement represents the most appropriate strategy when considered against reasonable alternatives.

We do not consider that the Wisley Airfield aspect of the plan is deliverable, particularly as a scheme very similar to that proposed in the Plan has recently been refused by the Council on a number of grounds which are unlikely to resolvable, and that consequently the plan is not effective: in particular, the reliance upon this particular site to provide 16.1% of the Borough’s 2034 housing figure places the delivery of the overall housing target at risk.

We also note that national policy (in particular paragraphs 117 to 119 of the National Planning Policy Framework) highlight the importance of ensuring effective protection of internationally important wildlife sites through the local plan process but consider that the inclusion of the Wisley Airfield proposal runs counter to that policy direction, meaning that the plan is not consistent with national policy.

In order to make the plan sound the proposed Wisley Airfield site allocation (and its associated references) needs to be removed from the plan.

This will make the plan consistent with national policy by respecting the policy and legislative safeguards accorded to the Thames Basin Heaths Special Protection Area, remove uncertainties about the delivery of a large proportion of the housing, and remove an inappropriate settlement proposal from the plan.

Answer: (No)

For a plan to be considered sound, paragraph 182 sets out that it must be:
- Positively prepared – the plan must be prepared and based on a strategy which seeks to meet objectively assessed requirements and where it is consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on appropriate 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 National Planning Policy Framework.

Taking the above into consideration, we consider the Plan as a whole meets the test of soundness as set out within paragraph 182 of the National Planning Policy Framework.
**Comment ID:** pslp17q/49  **Respondent:** 17276289 / Tom Newton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Answer:** (No)

I do not believe that the plan is sound specifically because

1. whilst evidence identifies significantly increased traffic levels in the Burpham area nothing has been shown to mitigate this

2. with minimal or non-existent current air quality monitoring, air quality impacts are not adequately assessed in the Plan. It cannot be determined what current pollution levels there are now and what the impact of the plan will be in the future, particularly with regard to the Burpham area

**Attached documents:**

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**Comment ID:** pslp17q/92  **Respondent:** 17303201 / Kevin Soobadoo  **Agent:** Caroline Wilberforce

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Answer:** ()

NPPF paragraph 182 states that the Local Plan will be examined 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”.

In relation to Amendment 8 of the Green Belt boundary at Flexford, we have assessed the soundness of the plan in accordance with the relevant parts of NPPF paragraph 182. These include the plan being consistent with national policy and justified using proportionate evidence.

NPPF paragraph 182 also states that the Local Plan should enable the delivery of sustainable development in accordance with the policies in the Framework to demonstrate soundness.

In our previous representations, we commented that retaining ‘Westholme’ in the Green Belt would fail to accord with NPPF paragraph 85. This paragraph states that when defining boundaries, local authorities should define boundaries clearly using physical features that are readily recognisable and likely to be permanent, and not include land which it is unnecessary to keep permanently open.

We concluded that the previously shown Flexford Green Belt boundary was inconsistent with national policy (as the Council had not recognised the permanent physical features surrounding the site) and that retaining Westholme in the Green Belt would fail to accord with the requirements of NPPF paragraph 182.

We are therefore pleased that the Council has since taken our previous representations into consideration and has now amended the boundary to the south west corner of Flexford (Amendment 8) to remove ‘Westholme’ from the Green Belt boundary based on our supporting evidence.

**Attached documents:**

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**Comment ID:** pslp17q/98  **Respondent:** 17303553 / Anita Fitchie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:
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2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
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Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

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15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be reassessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/102  Respondent: 17303713 / Andrew Fitchie  Agent:


Answer: (No)

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The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

---

Comment ID: pslp17q/135  Respondent: 17323265 / Simon Owen  Agent:


Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented council or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/146</th>
<th>Respondent: 17323713 / Obsidian Strategic (Philip Scott)</th>
<th>Agent: Obsidian Strategic (Philip Scott)</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness</td>
<td>Answer: (No)</td>
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</table>

The PSLP (June 2017) is not sound. The draft Plan has been published at a time when the Borough Council has administered a very significant under-delivery of housing when measured against 5 year housing land supply targets. Despite this lamentable context, the PSLP (June 2017) has amended the new Plan period, significantly reduced the OAN for the borough, and weighted annualised housing delivery to the back end of the new Plan period meaning that by 2027 (even using the Council’s proposed reduced OAN) there would be an accumulated 1000 dwelling shortfall when measured against the minimum annualised housing deliver target. The PSLP will therefore exacerbate house prices, harm affordability, and lead to further shortages of new market and affordable housing.
The PSLP has not taken on any unmet need from neighbouring authorities, and at a time of record demand for family and affordable homes the Borough Council has placed too much reliance on major sites that will take many years to deliver and it has omitted sites that could come forward in the first part of the Plan period (for example: Land at Pond Farm and Land south of Pond Farm Road (Site No. 80) which the draft Local Plan had draft allocated in previous versions of the emerging Local Plan. Site No. 80 is well located to a sustainable settlement, is close to a railway station and existing bus routes and GBC's own evidence base assessments show that Site No. 80 can be delivered without causing significant harm to the landscape or Green Belt.

**Attached documents:**
- Enplan_Pond Farm and part Land South of New Pond Road LVIA 210717.pdf (12.7 MB)
- Pond Farm_Draft Regulation 19 Reps.docx (1.2 MB)

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/198</th>
<th><strong>Respondent:</strong> 17341057 / Sustainable Land Products Limited (Owen Davies)</th>
<th><strong>Agent:</strong> Roger Daniels</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness</td>
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<td><strong>Answer:</strong></td>
<td>(No)</td>
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The Local Plan is not sound because it fails to comply with paragraphs 14, 47, 84, 85 and 182 of the National Planning Policy Framework.

In particular, the plan fails to meet the full objectively-assessed need for housing over the whole of the plan period and fails to achieve a five-year supply of housing land on adoption of the Local Plan.

In addition, the Review of Green Belt and the Spatial Development Strategy have not given sufficient weight to meeting the full objectively-assessed need for housing throughout the life of the plan and the need to promote sustainable patterns of development.

Please refer to the accompanying report by Sustainable Land Products (Tangley Place Concept Statement) for further details.

**Attached documents:**
- BRS.5853_12 C Design Vision 230617.compressed (1).pdf (15.3 MB)

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<tr>
<th>Comment ID:</th>
<th>pslp17q/215</th>
<th><strong>Respondent:</strong> 17343361 / Zurich Assurance Limited</th>
<th><strong>Agent:</strong> Barton Willmore LLP (Gary Stevens)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness</td>
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<td><strong>Answer:</strong></td>
<td>(No)</td>
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Refer to the attached documents that set out our client's case for why the following aspects of the plan are unsound:

- Meeting objectively assessed housing needs, including Woking Borough Council's unmet housing needs (Policy S2: Planning for the borough - our spatial development strategy)
- Ensuring a robust and deliverable employment land strategy (Policy E1: Meeting employment needs and Policy E3: Maintaining employment capacity and improving employment floorspace)
- The deletion of Site A34: Broadford Business Park as a residential site allocation contributing to the inability of Guildford Borough Council to meet objectively assessed housing need, including unmet need, in full.

On the basis of the above and evidence contained in the attached reports, our client considers the Proposed Submission Local Plan to be unsound and fail the tests of paragraph 182 of the NPPF and associated guidance.
Comment ID: pslp17q/666  Respondent: 17345441 / Thakeham Homes (Sarah Sutcliffe)  Agent:


Answer: (No)

NPPF, para 182 sets out the requirements for a Local Plan to be found ‘sound’. We believe that the Local Plan is currently unsound as it stands on the basis that:

• The Local Plan is not positively prepared, as it fails to meet objectively assessed development requirements, including unmet requirements from neighbouring authorities;

• The Local Plan is not effective as it is not based on effective joint working on cross-boundary strategic priorities;

• The Local Plan is not consistent with national policy, particularly in relation to NPPF, para 14. The reduction in housing provision in Policy S2 demonstrates that the Council is not positively seeking opportunities to meet development needs.

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 guidance. Where there is insufficient evidence to demonstrate a requirement for such policies, these should be deleted from the Local Plan.

Comment ID: pslp17q/229  Respondent: 17348225 / Thakeham Homes (Katherine Munro)  Agent:


Answer: (No)

Availability, Suitability & Achievability

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 wish to actively engage with the Council to promote the site for the delivery of around 200 much needed homes.

Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and should the Council allocate the site for removal from the Green Belt, we would look to commence 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 lies adjacent to the settlement boundary of Shalford, which is proposed to be inset from the Green Belt within the Proposed Submission Local Plan. We support the proposed insetting of the village, and consider that this site could provide an extension to the built area to provide housing. The insetting of the settlement reflects the sustainability of the village and the suitability of the area as a location for some level of growth in the plan period.

As stated above, the site is set within a sustainable, edge-of-settlement location adjacent to the proposed settlement boundary and the Council’s Green Belt and Countryside Study Volume III (2013) notes that “the site is surrounded by defensible boundaries”.

We therefore consider that the site is suitable for the delivery of residential development and should therefore be removed from the Green Belt.

**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 relative lack of constraints affecting this site, it is considered that the site could deliver around 200 dwellings within the plan period.

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 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. We have appended to this representation an indicative site plan without constraints to illustrate where development could potentially be delivered on the site.

**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. The intention of Guildford Borough to not contribute to the unmet needs in the HMA is of particular concern.

As demonstrated above, the Local Plan is not positively prepared, effective or consistent with national policy and therefore in accordance with NPPF, paragraph 182 is not ‘sound’.

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 have actively promoted this site for residential development and are pleased that the Council has sought to inset the settlement of Shalford from the Green Belt. Notwithstanding this, it is our view that the Council should work proactively to identify and include additional housing site allocations in sustainable locations in the towns and villages and areas of least constraint to meet the full OAN for the HMA and provide sufficient flexibility to adapt to rapid change in accordance with NPPF, paragraph 14.

We have demonstrated within these representations that the Land East of Chinthurst Lane, Shalford, is available, suitable and deliverable for residential development. As such, we recommend that this site is allocated to assist with meeting the Borough’s housing land supply shortfall, as the site is deliverable within the first 5-years of the plan period and provides a sustainable location for residential development.

Attached documents:

Comment ID: pslp17q/252  Respondent: 17373025 / Stephen Marshall  Agent:
Answer: (No)

This is a consultation response to the Proposed Submission Local Plan dated June 2017, mainly in relation to the Normandy and Flexford area where I am a resident. I am by profession an environmental consultant specialising in advising local authorities on matters of ecology, open space and planning. I am a former local government Assistant Director in these areas.

I support the removal of policies / sites A46 and A47 and am pleased that the Council has recognised the multi-faceted reasoning for this.

I however strongly object to several other aspects of the plan relating to Normandy, Flexford, the Hogs Back, general changes to the green belt boundary and how the plan interprets / fails to interpret parts of the evidence base. I believe these elements mean the plan remains unsound.

Attached documents:

Comment ID: pslp17q/261  Respondent: 17382305 / Brian Austin  Agent:
Answer: (No)

I object to the housing need statistics on which the plan is based as unsound. The projection for new houses over the plan period amounts to an increase of over 20% yet the Office for National Statistics (ONS) projection is for a population growth of some 10%: why is there this discrepancy?. The ONS projection was based on trends before the Brexit vote and on present indications there is a high risk that Brexit will result in the growth of both the economy and population becoming negative. The plan has not been adjusted for this possibility and with the likelihood that there will be a shortage of both private and public funds for investment in development and infrastructure proceeding with the present plan looks unjustified and unwise.

Attached documents:

Comment ID: pslp17q/264  Respondent: 17383969 / Maureen Mitchell  Agent:
Answer: ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

Attached documents:

Comment ID: pslp17q/302  Respondent: 17408545 / Helen Craig  Agent: 
Answer: (No) 

In addition specifically relating to The consultation on the Guildford Borough Council proposed Submission Plan under Regulation 19

• 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.

Attached documents:

Comment ID: pslp17q/339  Respondent: 17424065 / Hugh Grear  Agent: 
Answer: (No) 

I object to the revised Draft Local Plan. I objected before and I maintain that objection. It is my view that the submission plan is unsound due to the large number of errors in the plan, the poor quality 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. There is also considerable lack of clarity.

I don’t believe that GBC have used the right process, as it is clear to me that there have been significant changes in many material aspects, yet they have used the more limited consultation as if the changes were minor. This is either a huge error of judgement, or an intention to marginalise the local people from the process.

Attached documents:

Comment ID: pslp17q/406  Respondent: 17447169 / Hazel Eve  Agent: 
Answer: (No)

The draft local plan should not be submitted as it stands because the housing number used is clearly unsound. No acceptable justification for removing Green Belt protection has been demonstrated. Constraints for infrastructure and Green Belt should be applied but the draft local plan fails to do this. In my opinion the draft local plan as a whole is unsound.

When the responses to the last consultation were published mine was missing and other comments appeared under my name. It took several weeks for this to be corrected.

Attached documents:

Comment ID: pslp17q/487  Respondent: 17466593 / Woodcock Bros (Wimbledon) Limited  Agent: Woolf Bond Planning (Thomas Rumble)


Answer: ()

The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

Effective means the document must be deliverable, flexible and be able to be monitored.

The positive preparation test also requires plans to be objectively assess development and infrastructure requirements from neighbouring authorities.

Attached documents:

Comment ID: pslp17q/672  Respondent: 17467233 / Guildford College Group (Guildford College Group)  Agent: Indigo Planning (Daniel Andrews)


Answer: (No)

As with the previous Regulation 19 consultation, we maintain that the Proposed Submission Local Plan is unsound because:

• It has not been positively prepared and it fails to adequately meet Guildford’s housing need or exceed minimum housing requirements;
• It is not based on a robust spatial strategy to meet housing need;
• It is not effective and is unlikely to deliver enough new homes over the Plan period; and
• It is inconsistent with the aims of national planning policy in terms of the presumption in favour of sustainable development.

Attached documents:
For the Plan to comply with the test of soundness it must be:

- 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.

We do not consider the Plan will be effective in delivering the required housing growth in line with the needs of the Borough. This is because:

- There is over reliance of very large strategic sites;
- Effective joint working has not been demonstrated with neighbouring authorities on cross boundary strategic priorities including the need for Guildford to deliver additional housing where those authorities are more heavily constrained;

We do not consider the Plan to be justified because of flaws in the Green Belt and Countryside Study and which has consequently resulted in the sub-optimum adjustment of the Green Belt boundaries.

Attached documents:

Vortal Properties considers that the changes to the Local Plan are thought to be sound.

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

Document part: Question 4 - Duty to cooperate
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

**Question 4 (2016):** Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate?

**Question 4 (2017):** With regard to the proposed changes to the plan, do you consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole has complied with the Duty to cooperate?

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2062</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
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<td><strong>Agent:</strong></td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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We welcome the approach adopted by local councils in Surrey of working together based on Memoranda of Understanding, although we note that neighbouring Waverley has not signed.

We are concerned that the Strategic Housing Market Area is not meaningful and omits nearby communities in Hampshire, such as Rushmoor, that are very important for planning housing, employment and transport in Guildford. Further, a strategic approach to Green Belt planning and commuting requires cooperation with more distant communities with transport and economic links. Aldershot, Frimley and Portsmouth are all relevant to Guildford.

Within the somewhat arbitrary Strategic Market Area, differences in approach have a distorting effect, as seen in Guildford’s Sustainability Appraisal.

Several large developments are proposed in neighbouring Plans that would have a very significant effect on Guildford and it is of concern that the impact of these has not been specifically addressed as part of Guildford’s Local Plan process.

There is no discussion in the transport papers about the traffic generated by Dunsfold or Cranleigh wanting to use Guildford’s roads. For example, the A281 is forecast to be far over capacity at Millbrook. Guildford BC is saying, in its views on the Town Centre Master Plan and the Transport Strategy, that it wants to opt for Scenario 2 which means a reduction of say 30% in capacity. So what will happen to traffic from Waverley that wants to go to the hospital or University? Will it try using the B3000? This does not appear to have been thought about.

**Attached documents:**

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<tr>
<th>Comment ID: pslp17q/474</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
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<td><strong>Agent:</strong></td>
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<tr>
<td><strong>Answer:</strong></td>
<td>(No)</td>
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</table>

We sustain our previous comment about the need to cooperate with settlements beyond the Green Belt and outside the supposed HMA.

We are concerned the impact of development at Dunsfold needs to be better planned and managed.

Please refer to our comments on unmet need from Woking under evidence and soundness. Cooperation is only meaningful if all parties apply policy on a common basis and GBC is failing to apply constraints appropriately to prevent sprawl and congestion.

**Attached documents:**
The Guildford Society is concerned that the Duty to Co-operate has not been shown to be applied evenhandedly. The impact of developments beyond the boundaries of Guildford Borough have not been fully assessed for impact on Guildford’s infrastructure, and, in providing for an inflated Objective Assessment of Need number in full (GL Hearn’s target), it is likely Guildford will have to take additional development from our neighbours who we expect to restrict their development by applying greater emphasis to maintaining Green Belt boundaries.

Attached documents:

There is no doubt in our minds that Guildford Borough Council has attempted to co-operate with numerous agencies and neighbouring boroughs. There is relatively little evidence (including in the Duty to Cooperate Topic Paper (2017)) to suggest there has been much tangible or useful response, which is deeply disappointing when the plan depends so much on external organisations.

Attached documents:

We have no evidence on which to base a decision.

Attached documents:

Thank you for giving Woking Borough Council the opportunity to comment on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites. Woking, Guildford and Waverley Borough Councils are in the same Housing Market Area and Functional Economic Market Area and as such have common strategic cross boundary issues of interest to be considered as part of the plan making process. Under the Duty to Cooperate, Woking Borough Council has already worked in partnership with Guildford Borough Council to scope the common strategic issues of interest, including housing, transport and infrastructure provision, and in particular, the traffic implications of your plan in Woking. Officers from both authorities have signed a Memorandum of Understanding to work together to address both current and future strategic cross boundary issues. So far, the partnership working between the two authorities is positive and purposeful. It
is important to highlight that Woking Borough Council is also in the process of preparing two Development Plan Documents, and the Duty to Cooperate discussions have been and should continue to be a two way dialogue between the two authorities to the mutual benefit of our respective Plans.

Attached documents:

Comment ID: pslp17q/268  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

Thank you for giving Woking Borough Council the opportunity to comment on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites. Woking, Guildford and Waverley Borough Councils are in the same Housing Market Area and Functional Economic Market Area and as such have common strategic cross boundary issues of interest to be considered as part of the plan making process. Under the Duty to Cooperate, Woking Borough Council has already worked in partnership with Guildford Borough Council to scope the common strategic issues of interest, including housing, transport and infrastructure provision, and in particular, the traffic implications of your plan in Woking. Officers from both authorities have signed a Memorandum of Understanding to work together to address both current and future strategic cross boundary issues. So far, the partnership working between the two authorities is positive and purposeful. It is important to highlight that Woking Borough Council is also in the process of preparing its Site Allocations Development Plan Document, and the Duty to Cooperate discussions have been and should continue to be a two way dialogue between the two authorities to the mutual benefit of our respective Plans.

Attached documents:

Comment ID: SQLP16/399  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

Cooperation is a two-way street. Guildford objected to Waverley’s plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking’s unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

Attached documents:

Comment ID: SQLP16/1288  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)
I take this to mean duty to cooperate with neighbouring Authorities – I see no evidence that this has taken place. Traffic generated affects all neighbouring boroughs not just those taken as a joint housing area. For example the proposed Wisley Airfield site will have a major impact on Elmbridge.

Attached documents:

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**Comment ID:** SQLP16/964  **Respondent:** 8575585 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

**Question 4**

Duty to cooperate

The response following repeats the relevant part response to Question 1.

* COOPERATION

Set originally for reasons stretching far back into mediaeval history, the local authority boundaries do not any longer reflect real market boundaries. The Guildford work, shopping and housing areas stretch over the County boundary into Rushmore and far beyond. For one example, the pool of cheap housing for Guildford is in Aldershot. The draft shows signs of discussions with Waverley and Woking but little evidence of in-depth cooperation with Rushmore and beyond - instead, Rushmore and beyond authorities are cooperating with authorities to their west, but not to the east.

THE ORIGINAL 1944 SPECIFICATION FOR GREEN BELT POSTULATED THAT EXPANSION WOULD LEAP THE GREEN BELT. That means Rushmore, not Gosden Hill Farm.

Attached documents:

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**Comment ID:** SQLP16/1934  **Respondent:** 8579649 / Home Builders Federation (Mr James Stevens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

Thank you for consulting with the Home Builders Federation (HBF) on the submission version of the Guildford Local Plan.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC’s, regional developers and small, local builders. In any one year, our members account for over 80% of all new “for sale” market housing built in England and Wales as well as a large proportion of newly built affordable housing.

**We would like to submit the following representations on the Local Plan and we would welcome, in due course, participating in hearings of the Examination in Public.**

Paragraph 1.9, page 9: Duty to Cooperate
The HBF has some concerns that the Guildford Local Plan is unclear about how any potential unmet housing needs in the Housing Market Area arising in Waverley and Woking will be accommodated. As such the Local Plan is not positively prepared.

There are many very positive aspects to the new Local Plan that are supported by the HBF. However, we feel the Local Plan could say more about the cross-boundary strategic question of housing. It would have been useful, for example, to know whether an unmet housing need is expected to arise in either Waverley or Woking and how this situation is going to be dealt with. It would be helpful to know whether it is anticipated if the three HMA authorities will collaborate to address any unmet need. We have noted the Duty to Cooperate Topic Paper of June 2016. Even though Guildford is to be applauded for planning to meet its own OAN in full, it is possible that the other two authorities of the Housing Market Area (HMA) – namely Waverley and Woking – may be faced by a shortfall in supply. While the collaboration on a joint SHMA is strong evidence of effective cooperation, the paper does not say much about the housing land supply situation in either Waverley or Woking.

It seems highly likely in the case of the borough of Woking that Woking will not be able to address its OAN in full. We say this because Woking’s current Core Strategy – examined and found sound back in 2012 (Woking was one of the first authorities in the country to have a local plan found sound under the new NPPF-based regime) – did have an identified undersupply of potentially circa 300 dwellings per annum (dpa). It is difficult to be conclusive about the size of the unmet need since the provisions of the NPPF were not strictly applied in the case of Woking since the plan was devised under the auspices of the South East Plan and submitted prior to the publication of the new national policy. Nevertheless, on the basis of the evidence that was available, it was judged that the plan did not meet its OAN in full: the OAN was judged to be potentially about 594 dpa. This was not a conclusive verdict, as explained in paragraph 81 of the inspector’s report (dated 26 July 2012), but it seemed likely on the basis of the evidence that had been submitted. As the inspector concluded:

“Whilst the submitted CS does not plan to meet the objectively assessed housing needs of the Borough, I am mindful that the NPPF indicates that the aspiration to meet housing need is dependent upon consistency with other parts of the Framework. With this in mind and as evidenced by the SA, the Council has considered alternative levels of housing provision, for example, its Option 3[1] which considered the provision of 594 new dwellings per year.”

Furthermore, the affordable housing need in Woking was assessed to be 499 dpa (see paragraph 78 of the inspector’s report). Provision was made in the Core Strategy for only 292 dpa. This figure was derived from the South East Plan target. Therefore, whatever the OAN figure might have been, it was likely that Woking was not be able to meet its OAN in full.

There is, consequently, a question about the unmet need that has accumulated in Woking since 2011 (the difference between the possible OAN of 594 dpa and the supply of 292 dpa) as well as the ability of Woking to accommodate its newly assessed OAN figure of 517 dpa.

We are concerned that despite the assurances made at the time by Woking Council, little concrete action has been taken to resolve the problem of this shortfall. When Woking’s Core Strategy was assessed by the examining inspector back in 2011, the inspector had concluded that the other authorities of the HMA, would quickly come to the assistance of Woking. As the inspector commented:

“It will be incumbent upon the Borough and its neighbours to ensure that the processes and outcomes related to the Duty to Cooperate are honed further to maximise the sustainable delivery of suitable housing.” (paragraph 82).

For various reasons this did not happen. While it is possible that Woking may be able to recycle sufficient previously developed land to accommodate the new figures contained in the SHMA September 2015 study, this seems unlikely. We note that the new OAN figure for Woking of 517 dpa is more-or-less similar to the potential OAN figure of 594 dpa of the current Core Strategy. This would suggest that Woking will still be confronted by a problem which is at least comparable to the one it faced back in 2011. The difference is that while parties were assured that the problem of the unmet need would be addressed in the subsequent two years, this did not occur.

Woking’s ability to address its OAN in full probably depends on a green belt review. This is what the SEP envisaged and what the examining inspector referred to in his report.
These are matters that may have a bearing on the Guildford Local Plan.

Ideally a joint or aligned plans for all three authorities would be produced, setting out a strategy for addressing the unmet need in either Waverley or Woking (assuming there is one) and probably incorporating a coordinated green belt review. We recognise, however, the difficulties associated with preparing plans and coordinated efforts with other authorities. This is not necessarily a cooperation failing of the Guildford Local Plan but we are concerned that there is potentially an issue in Woking that the Guildford Local Plan will not be able to help resolve.

We have noted the discussion on pages 11 and 12 of the Duty to Cooperate Topic Paper about the housing situation. We note that a memorandum of understanding (MoU) has been agreed and signed committing the three councils of the HMA to reviewing the SHMA in three years. We note that the review of the SHMA is linked to a review of the local plans, but only if such a review is deemed necessary. We feel that the intentions of the three authorities on this question needs to be clarified better. An early review may become necessary if there is an unmet need in the HMA is discovered that needs to be accommodated. We have considered the MoU in appendix 4. The key thing that is missing from this document is any confirmation that there is an unmet need that might need addressing. We accept that it may be too soon to confirm this, because Waverley and Woking are still doing work on their own local plans which will include identifying housing land capacity within their own areas. Nevertheless, a commitment by all three authorities to finding a way to accommodate a potential unmet need would have been welcome. We feel this would have demonstrated full compliance with the duty to cooperate. The MoU is a too vague on this question.

[1] SA Appendix 5

Attached documents:

Comment ID: SQLP16/1148  Respondent: 8580065 / Surreyheath borough council (Jane Ireland)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

Surrey Heath Borough Council does raises and objection regarding the lack of duty to co-operate with respect of removing both Pirbright Barracks and Keogh Barracks from the Green Belt. As set out in our 2014 response Surrey Heath indicated that it is important that the plan-making process of both Surrey Heath and Guildford recognise these sites and that engagement and dialogue in relation to them is constructive and on-going.

Attached documents:

Comment ID: SQLP16/1439  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

Attached documents:

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Comment ID: SQLP16/1597  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

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Attached documents:

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Comment ID: SQLP16/1413  Respondent: 8583649 / Bell Cornwell LLP (Jane Terry)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

Insufficient consultation has taken place with health providers as to how the health needs of the local community will be addressed throughout the Plan period. This includes the strategic cross boundary provision of GP services taking on board the NHS England nationwide goal of providing more hospital consultant outpatient appointments in a community setting.
Following more extensive consultation with clinical providers, make a to the Plan to include an additional site allocation at New Pond Road, Farncombe for a Centre for Health.

Attached documents:

Comment ID: SQLP16/1727  Respondent: 8585601 / Jennie Kyte  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

Under the Duty to Cooperate policy the area under consideration has narrowed and the wider area has been overlooked. The Green Belt is also the Metropolitan Green Belt and is of great importance as an amenity which serves London.

London in effect reaches to Leatherhead and without the principle of permanence of the Green Belt being adhered to, the city will spread and urbanise the protected ring of countryside surrounding it, engulfing Guildford and its villages in the process.

The Mayor of London, Sadiq Khan, stated on 22 June 2016:

“I am determined to oppose building on the Green Belt, which is now even more important than when it was created.”

Attached documents:

Comment ID: pslp17q/637  Respondent: 8586369 / Mr Luigi Fort  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

Comment ID: SQLP16/1341  Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)
Normandy Parish Council strongly objects to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites ("Local Plan") and in particular to the allocation of land south of Normandy and north of Flexford for substantial development.

In principle objection to development of this site

The Parish Council opposes the principle of the development of this site:

1. The site lies within the Green Belt, and has been assessed by Guildford Borough Council (GBC) as having high sensitivity in Green Belt terms, serving to check the southward sprawl of Normandy and northward sprawl of Flexford, preventing the merger of those settlements, and safeguarding the countryside from encroachment (see Green Belt Purposes Assessment, April 2014). Accordingly, given the very significant contribution made by the site to the Green Belt in this area, it should not be developed.

2. The development of the site would not amount to sustainable development within the meaning of the National Planning Policy Framework. GBC's claim that the approach would be sustainable fails to attach any or any meaningful weight to the environmental aspects of sustainability.

3. The proposed allocation has not been the subject of any proper assessment of highways impacts. The local road network is incapable of coping with the proposed scale of development and there is no evidence that the necessary highways improvements are feasible or deliverable within the plan period.

4. The site lies within 1 km of the Thames Basin Heaths Special Protection Area and accordingly requires substantial provision of alternative green space as an avoidance strategy. Preferable sites for development elsewhere could be delivered without such provision.

The development of this site would significantly affect Normandy and the surrounding area and has not been justified in the Local Plan or in the supporting documents. In addition to the principled objections to the development set out above, the Parish Council considers that there have been substantial flaws in the plan-making process to date which go to both the merits and legality of the Local Plan.

Specific criticisms of the plan making process

A sound plan must be based on proper evidence and consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives (see Environmental Assessment of Plans and Programmes Regulations 2004/1633 and e.g. Calverlon PC v Nottingham City Council [2015] EWHC 1078 (Admin), per Jay J at (67)).

The history of the Local Plan is known to GBC. The Parish Council wishes to emphasise that in the 2014 plan, it was not proposed that this site be allocated for development. Since then, there has been no further Green Belt review, but there has been a Green Belt Purposes Assessment which identified this site as particularly sensitive in Green Belt terms.

There is no explanation in the published documents of the "exceptional circumstances" (NPPF, 80) that are said to justify release of the site from the Green Belt. The Green Belt Capacity Study does not explain why such exceptional circumstances exist, and nor does the Sustainability Appraisal ("SA"). Extraordinarily, the SA states that the development of the site is regarded as a "given" (6.3.16). The SA acknowledges (in footnote 68, p 131) the greater impacts on the Green Belt in developing sites such as this, but does not explain why such development is nonetheless justified on both environmental grounds and by reference to the exceptional circumstances test.

The SA is open to further criticism through its failure to accord any weight to the Green Belt in analysing various options. This is a significant deficiency which renders the SA unsound and indeed unlawful, since the alternatives are not subjected to proper analysis on environmental grounds.

Further, GBC has consulted on the Local Plan with the proviso that this site should be deleted from the plan should it be demonstrated the provision of a secondary school on the site is not required.
However, there has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the "exceptional circumstances" test. GBC's assessment of alternative secondary school sites notes that Surrey County Council's concerns as to remoteness of the site from development are as was only overcome by the new housing provision in the Local Plan i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

The Leader of GBC has suggested that the proposed houses should be regarded as "enabling development". The Parish Council submits that school funding should be achieved through the normal channels and not through the release of Green Belt land to housing development. This suggested cross-subsidy is an unjustified claim (there has been no viability analysis) and in any event is not a proper planning reason for allocating the site for development. The Local Plan is therefore unsound.

Next Steps

GBC's consultation on the Local Plan was based on the proviso that policy A46 was to be deleted in the absence of justification for the location of a secondary school at the site.

The Parish Council has seen no proper justification for the location of a secondary school in this Green Belt site. The selection of the site appears to have been justified on the basis that it will be close to the housing identified in the allocation. This makes for an entirely circular argument; the housing is only put forward on the basis of the school, and the school on the basis of the housing.

This cannot amount to an exceptional circumstance for the release of land from the Green Belt. There has been no adequate sequential site assessment for a new secondary school.

In those circumstances, GBC is invited to confirm that policy A46 will be deleted from the Local Plan because the school location has not been justified. The Spatial Strategy should be amended accordingly.

We await GBC's urgent confirmation that the Local Plan will not be proceeding with Policy A46 and that the land in question will remain within the Green Belt.

Attached documents: [LP2016-Normandy-L Clarke- Parish.pdf](642 KB)
Introduction

This representation relates to the duty to co-operate which is a legal duty that a local authority has to have fulfilled in order for a Submission Draft Local Plan to be allowed to move forward for Examination.

The Legal Duty

The importance of the ‘Duty to Cooperate’ is highlighted in the PPG in (Reference ID: 9-002-20140306) which states:

“The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. It is separate from but related to the Local Plan test of soundness.

The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further” [our emphasis].

The PPG goes on (Reference ID: 9-008-20140306) to advise that:

“...The duty to cooperate seeks to ensure that local planning authorities lead strategic planning effectively through their Local Plans, addressing social, environmental and economic issues that can only be addressed effectively by working with other local planning authorities beyond their own administrative boundaries. For example, housing market and travel to work areas, river catchments and ecological networks may represent a more effective basis on which to plan for housing, transport, infrastructure, flood risk management, climate change mitigation and adaptation, and biodiversity. The aim is to encourage positive, continuous partnership working on issues that go beyond a single local planning authority’s area” [our emphasis].

With regard to what actions constitute effective cooperation under the duty to cooperate, the PPG states (Reference ID: 9-011-20140306):

“…The actions will depend on local needs which will differ, so there is no definitive list of actions that constitute effective cooperation under the duty. Cooperation should produce effective policies on cross boundary strategic matters. This is what local planning authorities and other public bodies should focus on when they are considering how to meet the duty. Local planning authorities should bear in mind that effective cooperation is likely to require sustained joint working with concrete actions and outcomes. It is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone.

Authorities should submit robust evidence of the efforts they have made to cooperate on strategic cross boundary matters. This could be in the form of a statement submitted to the examination. Evidence should include details about who the authority has cooperated with, the nature and timing of cooperation and how it has influenced the Local Plan [our emphasis]

Paragraph 159 of the NPPF states that LPAs should collaborate with neighbouring authorities to prepare a SHMA. We comment further in the following section regarding our concerns about the accuracy and findings of the West Surrey SHMA.

Local Authorities are required to demonstrate that they have sought to meet not only their own full objectively assessed housing needs, but also addressed any unmet needs arising from their Housing Market Area or beyond if relevant (e.g. accommodating a proportion of London’s unmet Local Authorities are required to demonstrate that they have sought to meet not only their own full objectively assessed housing needs, but also addressed any unmet needs arising from their Housing Market Area or beyond if relevant (e.g. accommodating a proportion of London’s unmet needs). This is obviously a highly important strategic cross boundary matter.

The Council’s Duty to Cooperate Topic Paper (June 2016) refers in paragraphs 4.16 – 4.18 to liaison with the Mayor of London through the Greater London Authority. Mention is made of the fact that the Council has been represented by the
Head of Planning Policy from Mole Valley Council on the Strategic Spatial Planning Officer Liaison Group (SSPOLG) which was set up to address strategic planning matters across the wider South-East. It has also been represented on its officer working group successor and also on the Political Steering Group attended by Members.

Whilst it is evident that the Council has engaged with other local authorities by attending meetings and workshops, it is not apparent what specific actions and outcomes have resulted from this co-operation. In the context of London, in terms of whether adequate provision has been made to assist in meeting London’s unmet housing needs, it is clear from reading paragraph 4.33 of the Duty to Co-operate Topic Paper that no uplift has been made to the Council’s overall housing requirement.

The Topic Paper goes on in paragraph 4.42 to state that pursuant to the Memorandum of Understanding (MoU) the three local authorities that constitute the West Sussex HMA (Guildford, Waverley and Woking) are:

“…in the process of agreeing a Statement of Common Ground on housing delivery. This recognises that there is unmet need within the HMA and commits the three authorities to continued future joint working to ensure as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full”.

We note that the Council states in paragraph 4.43 that it does not consider that it can sustainably accommodate any unmet housing need arising from Woking. However, no further justification or explanation of why this is considered to be the case, is provided. It is apparent that there is currently considerable uncertainty with regard to the final overall housing figure for Guildford, if it will be required to address unmet housing needs from Woking and Waverley. This demonstrates the importance of ensuring that an adequate buffer exists of deliverable housing supply over the course of the Plan period.

Paragraph 4.45 refers to the fact that the delivery of the former Wisley Airfield (2000 dwellings), Gosden Hill (2000 dwellings) and Blackwell Farm (1800 dwellings) are all dependent upon the delivery and timing of key infrastructure requirements on the A3, with the majority of provision expected post 2027.

Furthermore, the Topic Paper states in paragraph 4.65 that the former Wisley airfield site includes land which is allocated in the Surrey Waste Plan 2008 for waste development and safeguarded in the Aggregates Recycling Joint Development Plan Document 2013 as having potential for production of recycled and secondary aggregates, and for an aggregate recycling depot. Surrey County Council submitted comments to the recent planning application for this site (Ref: 15/P/00012) that the proposal would have an unacceptable impact on the provision of such facilities and is therefore contrary to these development plans.

This demonstrates that considerable uncertainty exists regarding the deliverability timescale for a very substantial component of the Council’s overall housing land supply.

We note that the Council has stated its commitment to the future preparation of a Joint Housing Trajectory across the HMA as part of its Land Availability Assessment update work. However, in the absence of this it is difficult to see how the Council is now able to demonstrate the soundness of its Proposed Submission Local Plan.

The Test

The Duty to Co-operate is a legal duty that has to be complied with. It has far more weight and importance than the test of soundness that is applied to individual policies and proposals within a draft Local Plan.

Proposed Change

We consider that in order for the Council to demonstrate that it has complied with the duty to co-operate, the Local Plan must contain a commitment to ensuring that the unmet needs of the Housing Market Area will be addressed.

Attached documents:  Duty to Cooperate.pdf (476 KB)
Comment ID: pslp17q/168  Respondent: 8599937 / Development Planning Consultants (Richard Cooke)  Agent: Development Planning Consultants (Richard Cooke)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: (No)

Fails the test of soundness and duty to cooperate

Attached documents:

Comment ID: pslp17q/483  Respondent: 8601537 / Downsedge Residents’ Association (Rosemary Morgan)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: (No)

The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. It is separate from but related to the Local Plan test of soundness.

While there is evidence of some co-operation with both Waverley and Woking Borough Councils during the Local Plan process, notably in relation to Housing need, there seems to be very little acknowledgement of increased traffic flows through Guildford Borough which would arise from potential new large scale developments such as the proposed new development of 1,800 homes at Dunsfold Park (see above).

The Guildford housing market is also strongly related to the London housing market, with a regular flow of families out of London into the Borough. Downsedge RA has seen no evidence of any co-operation with housing authorities within the Greater London area, nor any appraisal of the possible implications of future changes to the London property market.

Attached documents:

Comment ID: SQLP16/1037  Respondent: 8604321 / Barton Willmore (Simon Potts)  Agent: Associate Vail Williams (Chris Wilmhurst)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: (Yes)

N/A

Attached documents:

Comment ID: SQLP16/1981  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

1. Duty to Cooperate

In the past CPRE has been very aware of the requirement for local authorities to demonstrate evidence of having cooperated to plan for issues with cross boundary impacts (NPPF 181). Now NPPF includes a chapter dealing with
Planning strategically across local boundaries’ on page 42 and GBC has followed this up with a Topic Paper on ‘Duty to Cooperate’ which explores the implications of this strategy. Sections in the Topic Paper under the headings “Enterprise M3 LEP” and “Meeting Needs” raise a number of issues about the newly established Strategic Economic Plan (SEP) and the choice of Guildford as one of four growth towns which are considered to be key to driving economic expansion across the Enterprise M3 area. As part of preparing the draft Local Plan, GBC has had regard to the SEP by seeking to meet both identified housing and employment needs. The emphasis on a “Sci:Tech Corridor” has also encouraged a focus on research, development and design activities and the provision of valuable knowledge-based employment. This in turn led to the proposed “allocation” of Blackwell Farm, which is owned by the University of Surrey, to be partly used as an extension to the Surrey Research Park and for 1,800 houses to be built on Green Belt land in a mixed use development. CPRE has objected to this proposal in its response to Policy A26 on page 17 of this submission. Policy E4 gives further details of the aspirational development concerned.

Little or no account is taken when making the Blackwell Heath proposal of the permanence of the Green Belt, the national importance of the AONB countryside, the problems of traffic congestion, and the lack of adequate infrastructure to provide easy access by either train to a new Guildford West station, or by road to and from the A31 on the Hogs Back. No consideration is given either as regards whether there is really a need to expand the Research Park onto Green Belt land in view of the very low density of buildings on this site, and the generous space allowed for surface parking. Surely, the provision of multi storey and/or underground parking should be given priority so that more space is made available for building this on the Research Park, the other two University campuses and at the Hospital.

- Wider Implications on Meeting Needs

The NPPF now requires that local plans meet objectively assessed needs, and where possible any unmet needs from neighbouring authorities as well where it is reasonable to do so and consistent with achieving sustainable development (NPPF 182).

Although Woking has indicated that it will have a substantial unmet need for housing, GBC has stated that Guildford Borough cannot assist them. Nonetheless CPRE is concerned that this new strategic policy approach suggests that the requirements of the economy are being given an unbalanced cross boundary ascendancy over well established environmental policies that are needed to protect the Green Belt and the Surrey Hills AONB at Guildford. This would seem to be influencing GBC planning in its adoption of the unusually high housing target of 693 from the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) whose recommendations are being questioned as flawed in the enclosed Green Balance review.

We find the draft Local Plan unrealistic not only because of its over ambitious onslaught on Green Belt policy but also because of the £3 billion shortfall in infrastructure backlog across the county which is recorded in the Surrey Infrastructure Study dated January 2016. This backlog has to include infrastructure issues relating to roads, rail, water as a finite resource, waste disposal and sewage treatment, flood issues, air pollution, and a range of other environmental and social considerations.

An example of a cross boundary impact includes the proposed development at Cranleigh and Dunsfold in Waverley which is clearly unsustainable and will cause major congestion problems all along the A281 to Guildford and will affect
communities such as Bramley, Chilworth, Shalford, Shamley Green, and Wonersh as well as adding to the severe congestion in Guildford town centre and the junctions of the A3 serving the town. CPRE OBJECTION.

Proposals for development of the North Downs rail line will affect AONB countryside in a number of districts and will need to involve the Surrey Hills AONB Partnership. A range of issues concerning rights of way, level crossings, bridge infrastructure, stations, footpath crossing safety and passenger service will need consultation. The protection and enhancement of nationally important countryside will be a major consideration.

The River Wey Navigation requires that the National Trust is consulted across district boundaries. Agreement is needed not only with Natural England concerning water quality standards but also how the flood plain is protected and not harmed by the proposed housing development in relevant boroughs. The effect of run-off from new building sites and of climate change has to be considered as a priority.

The emphasis on school provision is a repeated feature of the draft local plan in connection with new site proposals within the Green Belt. This has led CPRE to review catchment areas for schools (and the associated road traffic problems) near the borough’s boundaries with Mole Valley, Waverley and Woking. Communities such as Effingham, Leatherhead, Mayford, Ripley and Sheerwater are all affected. The planning for schools on new sites seems to be linked with the flawed concept that this is a means of obtaining Green Belt boundary revision as they represent “exceptional circumstances”. CPRE OBJECTION.

Another current problem relates to the fact that Surrey is already the most overflown county in England and aviation noise disturbance is increasing within the Surrey Hills AONB due to the number of active airports around the county and this affects Guildford. In addition to Gatwick and Heathrow, for which no runway expansion decision appears likely before mid October at the earliest, we refer in particular to proposals for expansion at Biggin Hill, City, and Farnborough. The CAA absolves itself from control of low flying movement below 4,000 feet as this is considered an LPA responsibility. The noise implications of Farnborough’s controlled airspace proposal affects all landing and take-off flight paths in the surrounding area. CAA policies have endorsed the concept of narrower flight paths until recently, and this resulted in severe noise implications for some communities, and harmed the remote character and tranquillity of nationally important countryside. The plans for Farnborough are also of particular concern as they will affect the use of the largest centre for gliding in the country at Lasham. Growth in aviation activity at these airports, whether for passengers or freight, will also lead to yet more road congestion. CPRE OBJECTION.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/371</th>
<th>Respondent: 8607169 / CPRE Surrey Branch &amp; Guildford District (Tim Harrold)</th>
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<td>Agent:</td>
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<tr>
<td>Document:</td>
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CPRE has already provided a substantial commentary on this topic for the 2016 Plan Submission we have made which we do not repeat here.

However, we are very concerned about a recent proposal which appears to be the possible likely outcome of the Waverley Borough Council Local Plan Part 1 Examination Hearings which took place from 27th June to 6th July under the Chairmanship of Inspector Jonathan Bore. This suggested that because of the inability of Woking Borough Council to meet its OAN target under the West Surrey SHMA due to the Green Belt, the shortfall in their housing provision would
have to be met by Waverley and Guildford. We understand that Guildford Borough Council have already made clear that they will not accept this “uplift proposal” from Woking, a decision which CPRE fully endorses. We wonder how much cross boundary communication took place if any between Guildford and Woking Councils on this matter, as required by the Localism Act 2011, before Woking made their decision to go ahead with a policy allowing the 50% constraint in question to be introduced.

CPRE expressed its reservations from the outset regarding the way in which the West Surrey SHMA was constituted at a meeting in 2009, when it was pointed out that Guildford, Waverley and Woking did not have much in common as a Market Area. The “Duty to Cooperate” requirement has been made even more difficult by the housing growth now being implemented in other areas outside Guildford such as Rushmoor, Waverley and Woking which appear to be disregarding Green Belt policy. We give below some examples of the problems to be faced in this context.

- **DUNSFOLD:** We have requested CPRE Waverley to summarise their current assessment of the potential impact of building proposals in Cranleigh and Dunsfold on Guildford. The Waverley Borough Local Plan draft locates 2,600 new houses at Dunsfold Park (the former Dunsfold Aerodrome) which depends on the A281, the only A road in this area. The road is already heavily congested on a daily basis, particularly in the morning and evening peak periods with traffic impacts on Shalford village to the South of Guildford town but within Guildford Borough. In the morning peak period, the traffic congestion is typified by long queues forming in Bramley (within Waverley Borough) at the roundabout in the centre of the village. The delay to pass this point can typically take up to 20 minutes. From here, there is a slow moving column of traffic up to Shalford, a mile to the north, where a further roundabout collects traffic from Cranleigh, Wonersh and Chilworth. Delays here are typically ten minutes for traffic entering from the Cranleigh direction and similar for traffic already on the A281. From Shalford Common, traffic is nose to tail daily up into the Guildford gyratory via Millbrook. The proposal for new housing at Dunsfold Park will add a significant volume of extra traffic to this scenario since the development is likely to be mainly made up of daily commuters seeking to enter Guildford, either as a through route to the A3 and M25 national trunk route or the mainline railway station for the onward journey to London. The scale of the development at 2,600 houses would be likely to generate some 5,200 to 6,500 additional vehicles (assuming 2 to 2.5 cars per household) of which a significant proportion would seek to access Guildford via the A281, and the gyratory system in the centre of the town. Added to this are further proposals within the Waverley Local Plan draft to locate an additional 1,520 houses in Cranleigh, adjacent to the Dunsfold aerodrome, which will again generate significant additional traffic volumes, of which a large proportion would seek to access Guildford via the A281 or the B2128. Waverley Borough are seeking to locate some 40% of their future development in the east of the borough, an area with no close railway access and therefore highly dependent on car transport. With the A281 being the only A class route out of this part of Waverley, it is inevitable that there will be a significant impact on Guildford in terms of congestion and air quality. And in addition to car use, there is also a large quantity of daily HGV traffic from firms such as Axtell and Cranleigh Freight Services to be considered.

- **MAYFORD:** CPRE is also concerned about the impact of the new Hoe Valley school and athletics facilities and additional housing development at Mayford being built within the Green Belt in the Heathlands District of Woking which will add to the road traffic problems on the A320 in Guildford at Slyfield and the associated Link Road which is designed to facilitate access to the A3. Woking Council seem determined to disregard the policy regarding the Green Belt which we do not repeat here as these have been outlined in our last submission.

- **RUSHMOOR:** CPRE is further concerned about additional development in Rushmoor in Hampshire at Aldershot and Farnborough which again is causing road infrastructure problems across the boundary in Guildford. **BORDON:** CPRE Guildford would have expected more attention to have been given to the possibility of assessing with East Hampshire Council the potential of the eco-town Bordon for business and housing development now that the army has left. This is land which is not in the South Downs National Park nor in an Area of Outstanding Natural Beauty (AONB) or within the Metropolitan Green Belt. We would argue in favour of the rail link from Bordon to Bentley being reinstated with a view to reducing commuter road traffic across the boundary to Wrecclesham and Farnham in Waverley and to Guildford via the Hogs Back. A rail connection could make Bordon significantly more attractive for business development and employment potential. This could relieve pressure for expansion of the Research Park at Guildford which should in our view be reserved for businesses associated with research that are linked to the University. Commuting by train to and from Guildford would be further facilitated if a new station is opened at Park Barn.

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/169</th>
<th>Respondent: 8640353 / Julian Cranwell</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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<tr>
<td>Answer: (No)</td>
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Object. Whilst GBC has cooperated on a joint SHMA, with Waverley and Woking Councils, the other 2 subcontracted the SHMA development to GBC.

GBC subcontracted the work to G.L. Hearn, who in turn sub-contracted to Justin Gardner, which used its own proprietary model to calculate the housing need. The model used has not been released to any of the 3 councils, or the public, in order for the workings to be independently verified, as required by the NPPF.

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/889</th>
<th>Respondent: 8655233 / Kay Mackay</th>
<th>Agent:</th>
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24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

20.A. Question 4: Duty to cooperate

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Attached documents:

Comment ID: pslp17q/73  Respondent: 8667713 / Victoria Sinnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

Non-plan Items – My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: SQLP16/327  Respondent: 8687041 / Michael Aaronson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: (No)

The Plan fails to take into account the very significant impact of the housing development taking place to the West of the Borough, in Rushmoor (especially in Aldershot). This will have a significant impact on the transport infrastructure in the
area, which is already at near full capacity. There is no indication in the Plan that the housing development proposals, especially Policy/Site A46 in Normandy/Flexford - which would themselves add a huge extra burden to the same infrastructure - have taken this into account. I therefore OBJECT to the Plan on the basis that there is evidence of a lack of planning co-operation across this local authority boundary.

Attached documents:

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**Comment ID:** SQLP16/988  **Respondent:** 8703585 / N J Axten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

The revised plan still fails to take account of the response from residents to the 2014 Plan.

GBC is running roughshod over the express wishes of the local people.

Attached documents:

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**Comment ID:** SQLP16/813  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

24.D. Question 4: Duty to cooperate

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I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

Comment ID: pslp17q/520  Respondent: 8709249 / Geoff Spink  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: SQLP16/391  Respondent: 8717921 / Helen Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

Significant objections were made by both Elmbridge Borough Councils and Woking Borough Council to the recently rejected planning application which is almost identical to proposed development of policy A35 - I cannot understand how the continued inclusion of this policy evidences that the Duty to cooperate has been carried out.

Attached documents:

Comment ID: SQLP16/678  Respondent: 8726529 / Eric Palmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

24.D. Question 4: Duty to cooperate

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I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Please acknowledge receipt of my comments.

**Attached documents:**

Comment ID: SQLP16/627  **Respondent:** 8729217 / Karen Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

I do not believe that GBC has complied fully with the Duty to Cooperate. The Strategic Housing Market Area, whilst it includes the neighbouring boroughs of Waverley and Woking, omits Rushmore entirely. Rushmore also has an impact on Guildford’s housing, employment and transport links.

GBC has not explored in detail any joined-up approaches to providing employment land across the region, dismissing off-hand such ideas on the basis that “we don’t want Guildford to be a dormitory town”. [Stephen Mansbridge, April 1, 2014].

In particular GBC is ignoring Bordon Eco-town, a brownfield site outside the Green Belt, which is less than 30 minutes from Guildford by road, and is looking for high quality businesses to locate there. This is exactly the right area for expansion of some of Guildford's businesses (particularly those on the Research Park).

There is also opportunity to develop rail links using existing lines and disused MOD lines.
In the Whitehill and Bordon Inward Investment Strategy 2012 Consultation Draft the masterplan recognises that “the town does not operate in isolation of its neighbouring business centres, such as Alton, Petersfield and Farnham and larger economic centres such as Portsmouth, Farnborough, Basingstoke and Guildford.”

Attached documents:

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<thead>
<tr>
<th>Comment ID: SQLP16/543</th>
<th>Respondent: 8729313 / Lisa Wright</th>
<th>Agent:</th>
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NO consultation with neighbouring councils, Rushmoor Borough Council being next door as an example.

Rushmoor is building thousands of homes which impact our road network. A31, A3

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<table>
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<tr>
<th>Comment ID: SQLP16/1031</th>
<th>Respondent: 8731649 / Ian Slater</th>
<th>Agent:</th>
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I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

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Comment ID: SQLP16/1534  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: (No)

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Attached documents:

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Comment ID: pslp17q/643  Respondent: 8741761 / June Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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<tr>
<th>Comment ID: SQLP16/1284</th>
<th>Respondent: 8744417 / Mark &amp; Gillie Hammersley</th>
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<th>Comment ID: SQLP16/469</th>
<th>Respondent: 8749121 / George Paton</th>
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NON COMPLIANCE

1. failure to collaborate with Elmbridge regarding the implications of choosing site A35 which stands on the Elmbridge border

2. failure to complete traffic studies in collaboration with SCC and HE

3. failure to disclose details of collaboration with SCC and HE over highways matters - the so-called 'mitigation' for the effects of the exaggerated housing proposals
4. failure to collaborate with Woking and Waverly on the SHMA. Neither Woking nor Waverley have a copy of the demographic housing model prepared by Justin Gardner Consulting. Without the model there can be no meaningful dialogue let along ‘collaboration’

Attached documents:

**Comment ID:** SQLP16/1460  **Respondent:** 8749473 / Charlotte Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

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In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

Attached documents:

**Comment ID:** SQLP16/1486  **Respondent:** 8769793 / Laura Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

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**Attached documents:**

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**Comment ID: pslp17q/624  Respondent: 8770177 / Phil Attwood  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate**

**Answer:** ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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**Attached documents:**

---

**Comment ID: SQLP16/855  Respondent: 8771233 / Ranald Mackinnon  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate**

**Answer:** ()

**24.D. Question 4: Duty to cooperate**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

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I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**Attached documents:**

**Comment ID:** pslp17q/61  **Respondent:** 8771233 / Ranald Mackinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

**Non-plan Items – My Objections**

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

**Cumulative impact of changes – My Objections**

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

**Duty to Cooperate – My Objections**

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<th>Respondent: 8787969 / K Britton</th>
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Attached documents:

Comment ID: SQLP16/1831  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

Comment ID: pslp17q/529  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

Comment ID: SQLP16/1145  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()
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Attached documents:

**Comment ID:** pslp17q/59  **Respondent:** 8798849 / David Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

**Non-plan Items– My Objections**

- Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

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Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to
residents.

Attached documents:

Comment ID: pslp17q/634  Respondent: 8798881 / H L Cousins  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

G. Duty to Cooperate – Our Objections

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Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green
Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure
and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

Comment ID: SQLP16/1515  Respondent: 8800545 / Bill Taylor  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
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the housing need figures commissioned by the Council from GL Hearn.

Attached documents:

Comment ID: pslp17q/567  Respondent: 8801505 / Paul Edwards  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

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Comment ID: pslp17q/582  Respondent: 8801665 / Charlotte Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

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Comment ID: SQLP16/1041  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

I have no direct knowledge of the extent of cooperation with Surrey County Council and other local authorities. It is clear that the cooperation with the Surrey County Council over Site 77 in the 2014 plan was wholly inadequate.

Attached documents:

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Comment ID: pslp17q/390  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

I have no means of knowing whether Guildford BC, other local planning authorities, Surrey County Council and other public authorities have complied with the duty to co-operate.
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/463</th>
<th>Respondent: 8806849 / Roland McKinney</th>
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I believe that the duty to co-operate has not been fulfilled. Guildford shares its boundary with 6 neighbouring authorities, yet has consulted with only two. The West Surrey SHMA is a totally artificial construct, as the true housing area is much wider than just 3 authorities - Dorking in Mole Valley is a town that is just a few miles away from Guildford, but its housing market and that of Mole Valley was not considered.

In addition, in the Green Belt and Countryside Study, Vol IV (amended version) there is a recommendation that Mole Valley District Council be consulted before Effingham (which has a boundary with MVDC) was inset from the green belt. No evidence has been presented that shows that this has been done.

<table>
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<tr>
<th>Comment ID: SQLP16/895</th>
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Attached documents:

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Comment ID: pslp17q/553  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

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Comment ID: SQLP16/1280  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: pslp17q/650  Respondent: 8813409 / P Trusler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: pslp17q/642  Respondent: 8813601 / Gaenor Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Comment ID: pslp17q/638  Respondent: 8818433 / Julian Masters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()
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I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

Comment ID: SQLP16/1579  Respondent: 8826369 / Tim Madge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: pslp17q/531  Respondent: 8826369 / Tim Madge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

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<th>Comment ID: SQLP16/827</th>
<th>Respondent: 8827777 / Mary English</th>
<th>Agent:</th>
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24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

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Attached documents:

### Comment ID: SQLP16/1378  Respondent: 8828545 / Anjali Mittal  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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Attached documents:

### Comment ID: SQLP16/1752  Respondent: 8836129 / Roger Shapley  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

Response: NO

GBC has failed to take account of the creation of 3,800 dwellings in the Aldershot Urban Extension [AUE]. Aldershot is the source of many employees for retail and health sector jobs in Guildford. Many choose to commute into Guildford by car along the main routes between the two towns (A323, A324, A31). Apart from a passing acknowledgement of traffic data in the vehicle movement simulations, there appears to have been no attempt to acknowledge the impact of AUE or attempt to synchronise development schedules or combine approaches to central Government on infrastructure developments with Rushmoor Borough Council that would affect all Guildford’s western wards. Simply ignoring
Rushmoor BC because GL Hearn deem it not to be in the same strategic housing market is perverse. The Hart, Rushmoor and Surrey Heath SHMA 2014 carried out by Wessex Economics states that the major outward commuting flows are as follows:

“The largest outward commuting flows from Rushmoor are to Surrey Heath, Hart, Guildford, and Waverley. There are significant in flows of workers to Rushmoor from Surrey Heath and Guildford.

The largest proportion of Surrey Heath’s residents commute to Rushmoor and Guildford. There are in flows of workers to Surrey Heath from Hart, Rushmoor and Bracknell Forest.”

Woking BC covered in the same West Surrey SHMA as Guildford has recently concluded a £6million funding for part of its affordable housing requirement to be built in Rushmoor under the Duty to Cooperate, obviously considering Rushmoor to be of strategic significance and being willing to work with this neighbouring council. Not so Guildford BC and this omission will have a serious impact in western wards as AUE is built out.

Attached documents:

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**Comment ID:** SQLP16/1796  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green Belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance’ and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

Attached documents:

---

**Comment ID:** SQLP16/1584  **Respondent:** 8840033 / Jimmy Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

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Attached documents:

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**Comment ID:** pslp17q/63  **Respondent:** 8840033 / Jimmy Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

---

**Non-plan Items – My Objections**

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

**Cumulative impact of changes – My Objections**

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion and their effects on public health) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

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Attached documents:

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**Comment ID:** pslp17q/94  **Respondent:** 8840353 / Brendan McWilliams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
### B.ix. Non-plan Items– My Objections

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Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: (No)

The council has repeatedly failed to look after the people who live in Ash parish and has proposed far too much development in this area and repeatedly ignored the need to improve the roads leading out from this area.

This must improve

Attached documents:

Comment ID: SQLP16/1323  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: SQLP16/1382  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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The overall effect of the current proposals will be nothing less than devastating to the whole area, and must be rejected.

Attached documents:

Comment ID: pslp17q/601  Respondent: 8875329 / Katherine Cornwall  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: pslp17q/622  Respondent: 8875969 / Sean Gilchrist  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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**Comment ID:** SQLP16/1396  **Respondent:** 8881537 / Jean Baptist  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:**

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Attached documents:

**Comment ID:** SQLP16/1279  **Respondent:** 8892737 / David Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:**

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<td>21. I object to GBC not appearing to liaise with other neighbouring boroughs to fully understanding the massive implications of development in the SE. Continuing to work in silo’s will bring chaos to the already over populated and polluted South East.</td>
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**Attached documents:**

**Comment ID:** pslp17q/682  **Respondent:** 8899713 / Tessa Crago  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

Duty to Cooperate

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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**Attached documents:**

**Comment ID:** pslp17q/560  **Respondent:** 8900705 / Susan Fuller  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

**G. Duty to Cooperate – My Objections**

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Attached documents:

Comment ID: SQLP16/758  Respondent: 8901633 / Duncan Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

24.D. Question 4: Duty to cooperate

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Attached documents:

Comment ID: pslp17q/538  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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Attached documents:

Comment ID: SQLP16/2113  Respondent: 8903265 / Susan Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: (No)

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Attached documents:

Comment ID: SQLP16/1699  Respondent: 8905537 / Christopher Ross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

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Comment ID: SQLP16/1695  Respondent: 8906273 / G Baptist  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

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**Attached documents:**

**Comment ID:** pslp17q/616  **Respondent:** 8906305 / Anne Fort  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

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**Attached documents:**

**Comment ID:** SQLP16/2107  **Respondent:** 8909761 / Diana Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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Attached documents:

Comment ID: pslp17q/568  Respondent: 8921377 / Paul Maycox  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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<th>Respondent: 8921857 / Claire Kukielka</th>
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Attached documents:

Comment ID: pslp17q/563  
Respondent: 8930465 / Michael & Carol Cook  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate  
Answer: ()

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Attached documents:

Comment ID: pslp17q/112  
Respondent: 8933537 / Annie Ladd  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
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**Comment ID:** SQLP16/1778  **Respondent:** 8968001 / M & G Real Estate  **Agent:** Terence O'Rourke (Tim Hancock)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (Yes)

Yes

Attached documents:

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**Comment ID:** SQLP16/1106  **Respondent:** 8971233 / Tim J. Harrold  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

1. Duty to Cooperate

In the past CPRE has been very aware of the requirement for local authorities to demonstrate evidence of having cooperated to plan for issues with cross boundary impacts (NPPF 181). Now NPPF includes a chapter dealing with 'Planning strategically across local boundaries' on page 42 and GBC has followed this up with a Topic Paper on 'Duty to Cooperate' which explores the implications of this strategy. Sections in the Topic Paper under the headings "Enterprise MLEP" and "Meeting Needs" raise a number of issues about the newly established Strategic Economic Plan (SEP) and the choice of Guildford as one of four growth towns which are considered to be key to driving economic expansion across the Enterprise M3 area. As part of preparing the draft Local Plan, GBC has had regard to the SEP by seeking to meet both identified housing and employment needs. The emphasis on a "Sci:Tech Corridor" has also encouraged a focus on research, development and design activities and the provision of valuable knowledge-based employment. This in turn led to the proposed "allocation" of Blackwell Farm, which is owned by the University of Surrey, to be partly used as an extension to the Surrey Research Park and for 1,800 houses to be built on Green Belt land in a mixed use development. CPRE has objected to this proposal in its response to Policy A26 on page 17 of this submission. Policy E4 gives further details of the aspirational development concerned.
Little or no account is taken when making the Blackwell Heath proposal of the permanence of the Green Belt, the national importance of the AONB countryside, the problems of traffic congestion, and the lack of adequate infrastructure to provide easy access by either train to a new Guildford West station, or by road to and from the A31 on the Hogs Back. No consideration is given either as regards whether there is really a need to expand the Research Park onto Green Belt land in view of the very low density of buildings on this site, and the generous space allowed for surface parking. Surely, the provision of multi storey and/or underground parking should be given priority so that more space is made available for building this on the Research Park, the other two University campuses and at the Hospital.

(i) Wider Implications on Meeting Needs The NPPF now requires that local plans meet objectively assessed needs, and where possible any unmet needs from neighbouring authorities as well where it is reasonable to do so and consistent with achieving sustainable development (NPPF 182).

Although Woking has indicated that it will have a substantial unmet need for housing, GBC has stated that Guildford Borough cannot assist them. Nonetheless CPRE is concerned that this new strategic policy approach suggests that the requirements of the economy are being given an unbalanced cross boundary ascendancy over well established environmental policies that are needed to protect the Green Belt and the Surrey Hills AONB at Guildford. This would seem to be influencing GBC planning in its adoption of the unusually high housing target of 693 from the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) whose recommendations are being questioned as flawed in the enclosed Green Balance review.

We find the draft Local Plan unrealistic not only because of its over ambitious onslaught on Green Belt policy but also because of the £3 billion shortfall in infrastructure backlog across the county which is recorded in the Surrey Infrastructure Study dated January 2016. This backlog has to include infrastructure issues relating to roads, rail, water as a finite resource, waste disposal and sewage treatment, flood issues, air pollution, and a range of other environmental and social considerations.

An example of a cross boundary impact includes the proposed development at Cranleigh and Dunsfold in Waverley which is clearly unsustainable and will cause major congestion problems all along the A281 to Guildford and will affect communities such as Bramley, Chilworth, Shalford, Shamley Green, and Wonersh as well as adding to the severe congestion in Guildford town centre and the junctions of the A3 serving the town. CPRE OBJECTION.

Proposals for development of the North Downs rail line will affect AONB countryside in a number of districts and will need to involve the Surrey Hills AONB Partnership. A range of issues concerning rights of way, level crossings, bridge infrastructure, stations, footpath crossing safety and passenger service will need consultation. The protection and enhancement of nationally important countryside will be a major consideration.

The River Wey Navigation requires that the National Trust is consulted across district boundaries. Agreement is needed not only with Natural England concerning water quality standards but also how the flood plain is protected and not harmed by the proposed housing development in relevant boroughs. The effect of run-off from new building sites and of climate change has to be considered as a priority.

The emphasis on school provision is a repeated feature of the draft local plan in connection with new site proposals within the Green Belt. This has led CPRE to review catchment areas for schools (and the associated road traffic problems) near the borough's boundaries with Mole Valley, Waverley and Woking. Communities such as Effingham, Leatherhead, Mayford, Ripley and Sheerwater are all affected. The planning for schools on new sites seems to be linked with the flawed concept that this is a means of obtaining Green Belt boundary revision as they represent "exceptional circumstances". CPRE OBJECTION.

Another current problem relates to the fact that Surrey is already the most overflown county in England and aviation noise disturbance is increasing within the Surrey Hills AONB due to the number of active airports around the county and this affects Guildford. In addition to Gatwick and Heathrow, for which no runway expansion decision appears likely before mid October at the earliest, we refer in particular to proposals for expansion at Biggin Hill, City, and Farnborough. The CAA absolves itself from control of low flying movement below 4,000 feet as this is considered an LPA responsibility. The noise implications of Farnborough's controlled airspace proposal affects all landing and take-off flight paths in the surrounding area. CAA policies have endorsed the concept of narrower flight paths until recently, and this resulted in severe noise implications for some communities, and harmed the remote character and tranquillity of nationally important
countryside. The plans for Farnborough are also of particular concern as they will affect the use of the largest centre for gliding in the country at Lasham. Growth in aviation activity at these airports, whether for passengers or freight, will also lead to yet more road congestion. CPRE OBJECTION.

Attached documents:

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**Comment ID:** SQLP16/2006  **Respondent:** 8977025 / Sustainable Land PLC  **Agent:** Roger Daniels

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

No.

The Local Plan has not demonstrated compliance with the Duty to Co-operate. The SHMA Briefing Note says that the strategy’s link with housing needs in adjacent local authorities ‘will be explored as part of ongoing work’. There should be evidence that the duty has been discharged, including consideration of unmet housing requirements in neighbouring local authority areas.

Attached documents:

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**Comment ID:** pslp17q/58  **Respondent:** 9016897 / D Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

**Non-plan Items— My Objections**

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

**Cumulative impact of changes – My Objections**

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

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The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green
Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

Comment ID: SQLP16/199  Respondent: 9040673 / Anne Pearse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

I object, GBC have not cooperated on A44 by adding this in after the local plan was published and by not consulting.

Attached documents:

Comment ID: SQLP16/1082  Respondent: 9094753 / D Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

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Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

Comment ID: SQLP16/809  Respondent: 9298465 / Peter Grover  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

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**Attached documents:**

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<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/547</th>
<th>Respondent:</th>
<th>10551937 / Anne Davies</th>
<th>Agent:</th>
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<td>Answer: ()</td>
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Attached documents:

Comment ID: pslp17q/559  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: pslp17q/595  Respondent: 10703745 / Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: pslp17q/44  Respondent: 10724897 / Hilary Sewter  Agent:
The overwhelming sense of non-co-operation is exemplified by the re-submission of the Policy A43 Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley; namely this was rejected by around 30,000 people, thrown-out (apparently) but now has been re-submitted.

DUTY TO CO-OPERATE DOES NOT EQUATE WITH THIS ACTION

Attached documents:

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Comment ID: SQLP16/1097  Respondent: 10750945 / Lorna Crispin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

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Comment ID: SQLP16/1454  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

**Comment ID:** pslp17q/72  **Respondent:** 10765249 / Andy & Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

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Village life is part of the English culture and heritage. If building on green belt is allowed when it is not absolutely necessary our rural life style and the community nature of our villages, which is very prominent in West Clandon will be
removed for ever. The green belt if there partly to stop our country being changed, so I feel strongly that it should be upheld and not built on. I want my children and grandchildren to be able to grow up in a green surrey village in the way that I have.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1498</th>
<th>Respondent: 10769121 / Ali Elson</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td><strong>Answer:</strong> (No)</td>
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<table>
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<tr>
<th>Comment ID: pslp17q/546</th>
<th>Respondent: 10773153 / Miles Palmer</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
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<table>
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<tr>
<th>Comment ID: SQLP16/1610</th>
<th>Respondent: 10773441 / Barry Marshall</th>
<th>Agent:</th>
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**Comment ID:** SQLP16/1720  **Respondent:** 10782689 / Murray Dudgeon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:
**Comment ID:** SQLP16/1259  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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**Comment ID:** pslp17q/191  **Respondent:** 10789985 / TREG Consulting (Waleed Al Qadoumi)  **Agent:** ECA (Martha Covell)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** (No)

**Strategic Housing Land Availability Assessment AND Guildford Borough Land Availability Assessment**

- We set out our case for consideration of a ‘sustainable mixed use development’ on a green belt sites in Effingham (Land West of Effingham Common Road (Presumed Site Ref. 1408?)) in submissions made to Guildford Borough Council (GBC) on 15th October 2010 and 19th January 2011 (copy of covering letters enclosed in the appendices) as a result of Guildford’s ‘Call for Sites’. In both cases we submitted planning and landscape appraisals, constraints plans, Transport and Ecological Assessments and schematic master plans. We also submitted an assessment of each sites Suitability, Availability and Achievability in line with the SHLAA Practice Guidance. We confirmed that both sites could be delivered within 6 – 15 years and we requested due consideration in the ongoing review of the SHLAA and Green Belt and Countryside Study.

- However the SHLAA failed to include an assessment of the site submitted. We set out further concerns and copied our original submission to GBC in a letter dated 10 September 2013. Yet the updated (2014) SHLAA still failed to include an assessment of this fringe site and the published report offers little robust justification as to why this is the case.

- The Guildford Borough LAA (2016 and Addendum 2017) does include a list of 'Green Belt, Discounted Sites'. We can only assume that our site is included as Site Ref: 1408 'Land West of Effingham Common Road';

- Regulation 18 (3) of the Town and County Planning (Local Planning (England) Regulations 2012 places an obligation on GBC to consider all representations to the Local Plan. This states that "in preparing the Local Plan,
the planning authority must take into account any representations made to them”. Having reviewed all
documentation in detail, our submissions to the SHLAA ‘Call for Sites’ are and remain ‘invisible’.

- Normal practice is for all sites offered in the SHLAA ‘Call for Sites’ to be assessed. This allows an objective
and consistent appraisal to be made initially of each site, unconstrained by (but still mindful of) existing local
polices. This establishes what land supply there may be available to meet development needs and provides a transparent comparison of options available to meet these needs. This initial appraisal of sites then further be
tested for allocation through the Sustainability Appraisal process.

- The SHLAA sets out the sources used to identify sites and confirms that this included information from the
Green Belt and Countryside Assessment (GBCA). However the SHLAA itself provides no real justification for
the methodology followed and it appears that the GBCS has had an overbearing and unjustified influence on the
SHLAA assessment criteria. When we questioned officers directly, GBC provided the following justification for
the exclusion of certain sites in the SHLAA by stating (email of 2nd November 2011, Heather Sandell to Martha Covell). ‘Please be aware that the SHLAA is being informed by the Green Belt and Countryside Study. ……It is not possible to obtain the SHLAA assessment sheets as the work on the SHLAA is still in progress. For sites outside of the village settlements and urban areas, the Green Belt and Countryside Study is effectively the assessment sheet. If sites are not identified in the Green Belt and Countryside Study as potentially suitable for residential development, no further assessment work is required.” A further email on 22 August 2013 states ‘All land in the Green Belt cannot possibly be suitable for development, if it were, it would of course undermine the whole purpose of the Green Belt. We have used our GBCS to test suitability of land suggested to us that is in the Green Belt.’

- The NPPG (6/3/2014) sets out the methodology that should be undertaken in preparing housing and economic
land assessments. In relation to Stage 1 ‘How should sites/broad locations be identified? It states: ‘When
carrying out a desk top review, plan makers should be proactive in identifying as wide a range as possible of
sites and broad locations for development (including those existing sites that could be improved, intensified or
changed). Sites, which have particular policy constraints, should be included in the assessment for the sake of
comprehensiveness but these constraints must be set out clearly, including where they severely restrict
development. An important part of the desktop review, however, is to test again the appropriateness of other
previously defined constraints, rather than simply to accept them. Plan makers should not simply rely on sites
that they have been informed about but actively identify sites through the desktop review process that may have
a part to play in meeting the development needs of an area.’

- Whilst the SHLAA does not allocate sites, there can be no justification for the rejection of sites from further
assessment within the SHLAA, based solely on their inclusion within current green belt boundaries, which as the
Local Plan Issues and Options version, confirms in paragraph 6.5, establishes the special circumstances to
require the green belt boundaries in the Borough to be reviewed. It remains our view that the GBCS and SHLAA
evidence conflates the distinctive roles of each and contrary to the purpose of each study.
- On this basis, the Local Plan process fails to comply with Regulation 18(3) and the emerging plan is unsound as
there is no evidence that GBC have had regard to any of our submissions and made an appropriate assessment of
all sites, including fringe sites. This is contrary to guidance contained within the NPPG.

Attached documents:

Comment ID: pslp17q/653  Respondent: 10796417 / Richard Shenton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council
to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which
overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green
Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

**Comment ID:** SQLP16/1988  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

GBC has failed to take account of the creation of 3,800 dwellings in the Aldershot Urban Extension [AUE]. Aldershot is the source of many employees for retail and health sector jobs in Guildford. Many choose to commute into Guildford by car along the main routes between the two towns (A323, A324, A31). Apart from a passing acknowledgement of traffic data in the vehicle movement simulations, there appears to have been no attempt to acknowledge the impact of AUE or attempt to synchronise development schedules or combine approaches to central Government on infrastructure developments with Rushmoor Borough Council that would affect all Guildford’s western wards. Simply ignoring Rushmoor BC because GL Hearn deem it not to be in the same strategic housing market is perverse. The Hart, Rushmoor and Surrey Heath SHMA 2014 carried out by Wessex Economics states that the major outward commuting flows are as follows:

- “The largest outward commuting flows from Rushmoor are to Surrey Heath, Hart, Guildford, and Waverley. There are significant in flows of workers to Rushmoor from Surrey Heath and Guildford.
- The largest proportion of Surrey Heath’s residents commute to Rushmoor and Guildford. There are in flows of workers to Surrey Heath from Hart, Rushmoor and Bracknell Forest.”

Woking BC covered in the same West Surrey SHMA as Guildford has recently concluded a £6million funding for part of its affordable housing requirement to be built in Rushmoor under the Duty to Cooperate, obviously considering Rushmoor to be of strategic significance and being willing to work with this neighbouring council. Not so Guildford BC and this omission will have a serious impact in western wards as AUE is built out.

Attached documents:

**Comment ID:** SQLP16/19  **Respondent:** 10799489 / Shai Sinai  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

I object, GBC has been most uncooperative even underhanded with Send residents.

Attached documents:

**Comment ID:** SQLP16/1373  **Respondent:** 10809377 / Bernice Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.
This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

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Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

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The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

Attached documents:

---

Comment ID: pslp17q/644  Respondent: 10811361 / Simon Crago  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

Duty to Cooperate

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

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Comment ID: pslp17q/628  Respondent: 10816513 / Annmarie Shenton  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”
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Attached documents:

Comment ID: SQLP16/1452  Respondent: 10816993 / Jane Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: pslp17q/177  Respondent: 10846625 / Frank Drennan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole has complied with the Duty to cooperate. GBC’s approach to the local plan process is characterised by frequent late changes to key elements of the plan, many of this are of dubious value. These changes undermine its duty to cooperate by deliberately introducing elements into its already deeply flawed plan that serve only to confuse, distract and undermine the earlier efforts of those objecting to its plans.

A prime example of this is the inclusion of the Wisley airfield site (policy A35). Following a huge public outcry, Guildford Planning Committee had 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. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee.

GBC should revise its plan to take proper account of the many objections already made and cease adding new elements that only add further grounds for objection.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/571</th>
<th>Respondent: 10857249 / Alice Pashley</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
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<thead>
<tr>
<th>Comment ID: SQLP16/1230</th>
<th>Respondent: 10857889 / William Kyte OBE</th>
<th>Agent:</th>
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</table>

A number of issues, which will impact on the Guildford Local Plan, have not been addressed.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1771</th>
<th>Respondent: 10859553 / MARK Curtis</th>
<th>Agent:</th>
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<tr>
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**Question 4: Duty to cooperate**

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green Belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

**Attached documents:**
Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/621</th>
<th>Respondent: 10865537 / Edwina Fassom</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: pslp17q/570</th>
<th>Respondent: 10867585 / Hugh Shanks</th>
<th>Agent:</th>
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<th>Comment ID: SQLP16/8</th>
<th>Respondent: 10871169 / Lynn Durbridge</th>
<th>Agent:</th>
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<td><strong>Answer:</strong> (Yes)</td>
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I object to the way the proposed plan for Send and Ripley has been put forward. The new plan is totally different from the previous one and therefore be treated as a totally new plan.... with full consultation under regulation 18.
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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**Comment ID:** pslp17q/636  **Respondent:** 10884993 / Dave Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate  
**Answer:** ()

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**Attached documents:**

**Comment ID:** pslp17q/599  **Respondent:** 10889985 / Ruth Macdonald  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate  
**Answer:** ()

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**Attached documents:**

**Comment ID:** SQLP16/1596  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate  
**Answer:** ()

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The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

Attached documents:

Comment ID: SLP16/941  Respondent: 10892353 / Robert Wilson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (Yes)

N/A

Attached documents:

Comment ID: pslp17q/108  Respondent: 10892513 / C.R. Sewter  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

There is an overwhelming sense of incredulity and a feeling of getting no co-operation in particular with regard to your re-submission of Policy A43 Land at Garlicks's Arch, Send Marsh/Burnt Common/Ripley;namelyhis Policy was rejected be around 30,000 - a third of the people from Send. It was apparently throw out. Now it has been not only resubmitted, but amended unrealistically heavily. "Duty to co-operate" does not equate with this.

Attached documents:

Comment ID: SLP16/606  Respondent: 10915937 / Rona Lester  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

I feel like noone is listening to us at the council. We have objected before and now having to do it all over again with not a lot of changes to the OTHER plan. HOW can you call this co-operation? I thought the Wisely Airfield had been struck off the plan and now I find it is back AGAIN. How can this be co-operating with the local people if you just come back again and again with what seems like the same proposals.

The development of 2,000 homes (almost the same size as Horsleys today) in Wisley is a totally impractical option. (as has been brought to your attention many time before. The impact on the Horsley villages is SO huge and overpowering that it will change the villages forever. It is only 2 miles from us and will have impact on the railway stations (already overcrowded parking) and other amenities.

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<table>
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<tr>
<th>Comment ID: pslp17q/572</th>
<th>Respondent: 10922913 / Henry Dowson</th>
<th>Agent:</th>
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<th>Comment ID: SQLP16/1249</th>
<th>Respondent: 10928737 / Guy Pashley</th>
<th>Agent:</th>
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<th>Comment ID: SQLP16/1520</th>
<th>Respondent: 10940833 / Natasha Taylor</th>
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<th>Comment ID: SQLP16/1281</th>
<th>Respondent: 10943457 / Henry Benzikie</th>
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<th>Comment ID: SQLP16/1282</th>
<th>Respondent: 10944161 / Stephen Benzikie</th>
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Attached documents:

Comment ID: pslp17q/597  Respondent: 10944385 / Clare Benzikie  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate  
Answer: ()

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Comment ID: pslp17q/86  Respondent: 10944513 / Amber Ellis  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate  
Answer: (No)

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### Attached documents:

**Comment ID:** pslp17q/575  **Respondent:** 10946721 / Gillian Allen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

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### Attached documents:

**Comment ID:** SQLP16/663  **Respondent:** 10952705 / Moira Maidment  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

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This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

Attached documents:

**Comment ID:** SQLP16/836  **Respondent:** 10957025 / Pauline Masters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

### 24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites **as a whole** has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

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I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:
G. Duty to Cooperate – My Objections
The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate. Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on GreenBelt land this latest version has as much, if not more, building on the GreenBelt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

I object to A43 proposal at Garlick's Arch

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Attached documents:

Comment ID: pslp17q/543  Respondent: 10962657 / Amanda Leader  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: pslp17q/550  Respondent: 10962689 / Martin Ladd  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: SQLP16/1672  Respondent: 10962785 / Derek Gilmore  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()
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<th>Comment ID: pslp17q/574</th>
<th>Respondent: 10967649 / Ian Cornwall</th>
<th>Agent:</th>
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<th>Comment ID: pslp17q/528</th>
<th>Respondent: 10970497 / Michael Cook</th>
<th>Agent:</th>
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Attached documents:

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**Comment ID:** SQLP16/1541  **Respondent:** 10972065 / Sarah Cocke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

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I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

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**Comment ID:** SQLP16/1767  **Respondent:** 10986657 / MC Nominees Ltd  **Agent:** Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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Attached documents:

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**Comment ID:** pslp17q/548  **Respondent:** 10986689 / Richard Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

**Comment ID:** SQLP16/1248  **Respondent:** 10987905 / Marika Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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Attached documents:

**Comment ID:** pslp17q/607  **Respondent:** 10987905 / Marika Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

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Attached documents:

Comment ID: SQLP16/1190  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

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Attached documents:

Comment ID: pslp17q/641  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: pslp17q/594  Respondent: 10992225 / Emma Ringshaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: SQLP16/1131  Respondent: 10992833 / Amanda Verny White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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**Comment ID:** pslp17q/66  **Respondent:** 10995297 / Peter Cormack  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

**Non-plan Items – My Objections**

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

**Cumulative impact of changes – My Objections**

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

**Duty to Cooperate – My Objections**

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Attached documents:

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**Comment ID:** SQLP16/1083  **Respondent:** 10997121 / Rob Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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Comment ID: SQLP16/1334  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

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Comment ID: SQLP16/1718  Respondent: 11007393 / James Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both
technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome
traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and
Greenfield sites and each of the above points addressed.

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I object on the grounds that I find this questionnaire impossible to understand for the average person. How are we supposed to make rational comments when it is not written in plain everyday language.

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<tr>
<th>Comment ID: pslp17q/590  Respondent: 11023585 / Jean Walker  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
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The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**Attached documents:**

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<th>Comment ID: SQLP16/551  Respondent: 11025281 / Alan Willmott  Agent:</th>
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</tr>
<tr>
<td>Answer: (No)</td>
</tr>
</tbody>
</table>
I can see no evidence of GBC considering the proposed developments in Aldershot which will have a significant impact on Guildford especially on road traffic.

Attached documents:

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**Comment ID:** pslp17q/544  **Respondent:** 11032801 / Louise Springfield  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

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**Comment ID:** SQLP16/1641  **Respondent:** 11036289 / Osman Abdullah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green Belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

Attached documents:

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**Comment ID:** pslp17q/521  **Respondent:** 11041025 / Debra Somner Fraser  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.
Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

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**Comment ID:** SQLP16/1110  **Respondent:** 11041121 / Catherine Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

I have no evidence on which to base a decision.

**RESPONSES TO POLICIES:**

It is my understanding that only the text in blue boxes constitutes “policy”. All the remaining text is not. If the accompanying text does not have the force of policy when planning decisions have to be made then a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little and provide little guidance for planning decisions. It is certainly not possible in many cases to read across from the non-policy wording to the policy itself.

Attached documents:

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**Comment ID:** SQLP16/925  **Respondent:** 11043553 / Geraldine Banks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

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The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.
This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

---

Comment ID: pslp17q/630  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Comment ID: SQLP16/1668  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Comment ID: pslp17q/576  Respondent: 11044129 / Christopher Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Comment ID: pslp17q/577  Respondent: 11044129 / Christopher Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: SQLP16/334  Respondent: 11045953 / Victoria Palmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

I object to development of more houses in Potters Lane, as it is already subject to enough through traffic between Guildford and Woking using it a ‘rat run’ to avoid the using the A247 between burnt common and The New Inn

Attached documents:
Question 4: Duty to cooperate

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Attached documents:

Comment ID: SQLP16/1146  Respondent: 11049473 / Victor Bates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: pslp17q/530  Respondent: 11049473 / Victor Bates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

**Comment ID:** SQLP16/1529  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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Attached documents:

**Comment ID:** pslp17q/140  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** (No)

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Attached documents:

Comment ID: SQLP16/1464  Respondent: 11054049 / Clare Goodall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: SQLP16/1844  Respondent: 11070113 / Alison Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()
Question 4: Duty to cooperate

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<th>Comment ID: pslp17q/471</th>
<th>Respondent: 11070113 / Alison Hague</th>
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<th>Comment ID: SQLP16/1473</th>
<th>Respondent: 11074465 / Louise Vaughan</th>
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<th>Comment ID: SQLP16/1020</th>
<th>Respondent: 11074561 / Tim Anderson</th>
<th>Agent:</th>
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Comment ID: SQLP16/1659  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green Belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

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Attached documents:

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Comment ID: pslp17q/552  Respondent: 11098369 / Neil & Nicki Covington  Agent:
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Duty to Cooperate

Reference is made in the Housing Delivery Topic Paper to the Memorandum of Understanding on housing delivery which was signed by the three authorities in the Strategic Housing Market Area, Guildford, Waverley and Woking. The MoU recognised that there is unmet need within the HMA and committed the three authorities to continued joint working to ensure housing needs across the HMA are met in full.

It is therefore also of some concern that the 2017 Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. The generally agreed view there was that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. Neither Waverley, nor Guildford appear to be taking the Duty to Cooperate very seriously in this respect, demonstrated by the view expressed in the Topic Paper that Guildford is unable to sustainably accommodate any unmet need arising from Woking despite a rigorous justification to support that view, and the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. As a result of the debate at the Waverley Examination, it is therefore highly likely that the Inspector will recommend that Waverley takes a significant proportion of the unmet need from Woking, leaving the remainder to be identified within Guildford Borough. Further scrutiny of the constraints and
opportunities for accommodating further development within Guildford to meet the overall needs of the SHMA must therefore be undertaken before the Duty to Co-operate can be considered to be appropriately discharged.

**Attached documents:**

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**Comment ID:** pslp17q/662  **Respondent:** 11458241 / Bewley Homes  **Agent:** Neame Sutton Limited (David Neame)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** (No)

Bewley Homes' representations in relation to the Plan as a whole and specific paragraphs, policies and, proposals are set out in the attached representations documents that clearly identify those sections of the Plan that Bewley Homes consider to either fail to be legally compliant, are unsound, or fail the duty to cooperate. In relation to the tests of soundness these are identified in bold against each section of the Plan that Bewley Homes is making representations against.

**Attached documents:**

---

**Comment ID:** SQLP16/1904  **Respondent:** 12316001 / Vail Williams LLP (Jane Terry)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

No.

The actions taken by the Council to conform to the Duty to Co-operate are set out in the Topic Paper Duty to Cooperate, June 2016.

**Cross Boundary SANG Provision**

In relation to the specific issue of The Thames Basin Heaths SPA ad Provision of SANG, the Duty to Cooperate Topic Paper states at paragraph 4.41 that the Council has worked closely with Natural England to ensure the quantum and distribution of growth identified in the Proposed Submission Local Plan is deliverable by demonstrating there is sufficient SANG available across the Borough’ (my emphasis). Paragraph 4.42 continues that: ‘…we have cooperated with some of or neighbours to explore opportunities for cross boundary SANGs. We will continue cooperating on this matter as appropriate.’

Notwithstanding this, proposals for a cross boundary SANG have been submitted within the planning application for residential development in line with Policy A46 to the east of The Street, Tongham. This is a bespoke SANG which is intended to provide for the mitigation requirements of residential development to the south of Tongham (Policy A46). However it also provides additional mitigation capacity for further residential development within a 5km catchment area. The SANG is cross boundary SANG which straddles the Guildford / Waverley administrative boundary and is therefore well placed to mitigate the development needs of both authorities. The SANG proposal does not appear in the Guildford Infrastructure Delivery Plan as either a strategic SANG or bespoke SANG. Neither does it appear in the Waverley SPA Avoidance Strategy Review, April 2016. No reference is made to any specific cross boundary discussions on the provision of SANG so it is difficult to assess whether the Duty to Cooperate has been adequately addressed in this respect or not.

**Provision of Housing within the SHMA**

In relation to housing, reference is made to the Housing Delivery Topic Paper which discusses the approach to meeting needs. A Memorandum of Understanding on housing delivery has been signed between Guildford, Woking and Waverley which recognises that there is unmet need within the HMA and commits the three authorities to continued
future joint working to ensure housing needs across the HMA are met in full. It states that the Council is committed to continuing to explore with Waverley and Woking those areas which are most likely to lead to positive outcomes. The Topic Paper goes on however, to state that Guildford does not consider it can sustainably accommodate any unmet need arising from Woking (or from Waverley should an unmet need be identified in the future).

The Localism Act establishes that the outcome of the Duty to Co-operate should lead to effective policies on strategic cross boundary matters: It is the outcome rather than the process that is critical to complying with this legal obligation. In relation to the requirement that local plans are prepared to meet objectively assessed needs, including unmet needs from neighbouring authorities, this statement is contrary to the Duty to Co-operate as it predicates how a positive outcome can be achieved.

Attached documents:

---

Comment ID: SQLP16/1977  Respondent: 13579713 / Roger Daniels  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

No.

The Local Plan has not demonstrated compliance with the Duty to Co-operate. The SHMA Briefing Note says that the strategy’s link with housing needs in adjacent local authorities ‘will be explored as part of ongoing work’. There should be evidence that the duty has been discharged, including consideration of unmet housing requirements in neighbouring local authority areas.

Attached documents:

---

Comment ID: SQLP16/580  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

n/a

Attached documents:

---

Comment ID: SQLP16/12  Respondent: 15057889 / Katherine Pyne  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

I object. I do not agree that the local planning authority has engaged constructively with the local residents over this plan.

Attached documents:
I object because due process was not followed as when the council took a vote on the plans when the Planning Assessment 2015 was not made available to those voting.

Attached documents:

I object to this plan. I do not believe that GBC has fulfilled its duty to cooperate. The Transport Assessment was not available to councillors for the vote taken on 24 May. The Garlick's Copse site in Send is new and was not included in the Regulation 18 draft and has not been consulted upon previously (Policy A43.30 ha). Land west of Winds Ridge and Send Hill (Policy A44.1.9 ha) is new and was not included in the regulation 18 draft and has not been consulted upon previously.

Attached documents:

No the local plan has not followed a Duty to Cooperate for many of the reasons I have already stated, not the least of which are Last Minute amendments and also the ignoring of the latest Housing (SHMA 2015) and Employment Land needs (ELNA 2015).

Attached documents:

I object

Attached documents:
I object

Attached documents:

**Comment ID:** SLP16/137  **Respondent:** 15110721 / Stuart Reeves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (Yes)

I object to the plan because BGC has not fully met its requirement for full consultation under regulation 18

Attached documents:

**Comment ID:** SLP16/155  **Respondent:** 15120481 / Jonathan Barratt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

I object. If cooperation was complete the greenbelts would not be considered as building areas.

Attached documents:

**Comment ID:** SLP16/175  **Respondent:** 15135873 / Julie Andrews  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)

I object because this has not followed process of soundness and compliance and should therefore not be considered until properly consulted.

Attached documents:

**Comment ID:** SLP16/191  **Respondent:** 15140289 / Francis Pearson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

I object, A44 was not included in the original plan and has not been consulted on.

Attached documents:

**Comment ID:** SLP16/229  **Respondent:** 15146017 / Liam Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (No)
I object as his does not comply with the duty to cooperate.

Attached documents:

Comment ID: SQLP16/233  Respondent: 15146049 / Ian Tulloch  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (Yes)

I object that Policy A44. 1.9 ha (land west of Winds Ridge and Send Hill) is NEW and was NOT included in the regulation 18 draft and has NOT been consulted upon previously.

Attached documents:

Comment ID: SQLP16/265  Respondent: 15156673 / Emma France  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

I object

I don't believe that the authority has done enough in consulting with impacted residents in the borough.

Attached documents:

Comment ID: SQLP16/1959  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

It is not clear how the Duty to Cooperate has identified any unmet needs arising from neighbouring constrained authorities such as Waverley Borough Council and as such it cannot be concluded that the Duty to Cooperate has been complied with.

Attached documents:

Comment ID: SQLP16/288  Respondent: 15199009 / Alan Toomey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (Yes)

The plan seeks to over whelm any local resident who tries to comment on it.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/492</th>
<th>Respondent: 15216129 / Timothy Hewlett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
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<tr>
<td><strong>Answer:</strong></td>
<td>(Yes)</td>
<td></td>
</tr>
<tr>
<td><strong>Text:</strong></td>
<td>Any duty to cooperate should only come into force when the public officials who have created the plan, and the greedy developers who they are hand in glove with have been properly investigated to find out the extent of corruption involved in the creation of this plan.</td>
<td></td>
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<tr>
<td><strong>Attached documents:</strong></td>
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<table>
<thead>
<tr>
<th>Comment ID: SQLP16/312</th>
<th>Respondent: 15234561 / Royal Surrey County Hospital (Alf Turner)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
</tr>
<tr>
<td><strong>Answer:</strong></td>
<td>(Yes)</td>
<td></td>
</tr>
<tr>
<td><strong>Text:</strong></td>
<td>There has been extensive cooperation by the Council with the hospital in the development of the local plan</td>
<td></td>
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<tr>
<td><strong>Attached documents:</strong></td>
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<table>
<thead>
<tr>
<th>Comment ID: SQLP16/354</th>
<th>Respondent: 15241313 / Christine Relf</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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<tr>
<td><strong>Answer:</strong></td>
<td>(Yes)</td>
<td></td>
</tr>
<tr>
<td><strong>Text:</strong></td>
<td>This site floods and any industrial space should be at Slyfield.</td>
<td></td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/360</th>
<th>Respondent: 15241345 / Peter Relf</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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<tr>
<td><strong>Answer:</strong></td>
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<tr>
<td><strong>Text:</strong></td>
<td>I object to Ancient woodlands and Ripley, Send and Clandon being removed from Green Belt.</td>
<td></td>
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<tr>
<td><strong>Attached documents:</strong></td>
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<table>
<thead>
<tr>
<th>Comment ID: SQLP16/542</th>
<th>Respondent: 15244097 / Persimmon Homes (Craig Hatton)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
</tr>
<tr>
<td><strong>Answer:</strong></td>
<td>(No)</td>
<td></td>
</tr>
<tr>
<td><strong>Text:</strong></td>
<td>Please see our comments and responses under question 1. Whilst the council should be applauded for making difficult decisions with regards to the increase in the housing numbers to be planned for and indeed decisions associated with Green Belt releases it is clear that the Duty to Cooperate has not been met with regards to seeking to meet the needs from London for example.</td>
<td></td>
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<tr>
<td><strong>Attached documents:</strong></td>
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</table>
The reduction in housing requirement for the Plan to 12,426 dwellings means that the Plan is unsound as the Council have failed to positively plan for meeting the needs of the Housing Market Area (HMA).

Persimmon are concerned that Guildford's co-operation with the neighbouring authorities within its HMA is insufficient. The HMA is made up of Guildford, Waverley and Woking of which only Woking has an adopted plan in place. Woking's Core Strategy sets out its housing requirement as 292 dpa which is 225 units below the OAN identified within the 2015 West Surrey SHMA. This results in significant unmet needs yearly and there appears to be no effective cooperation ongoing within the HMA to meet these unmet needs.

Due to the significant amount of unmet needs within the HMA it is unjustified for Guildford to consider reducing its housing requirement by 1400 units. It is unjustified on the basis that there is insufficient evidence to show that reducing its requirement is necessary and that Guildford appear to have made no attempts to assist with meet some of these unmet housing needs. The on-going examination of the Waverley Local Plan has also brought this issue to the fore. The inspector made reference to the unmet need generated within the HMA and has strongly intimated that Waverley and Guildford should be seeking to accommodate the unmet need from Woking. Similar examinations at Mid-Sussex and Horsham have resulted in recommendations that both of these authorities take 150 units each of Crawley's unmet housing needs. Horsham's plan was adopted with this requirement included and it appears that Mid Sussex's Local Plan will only be found sound if this contribution is also made in addition to increasing their housing requirement.

The SHMA addendum has been produced solely to inform Guildford's Local Plan and not in conjunction with the HMA as a whole. Therefore this addendum has only considered Guildford's needs into account rather than also considering those of the HMA. If the Council believe that a reduction was justified then the impacts of this should have been considered on the wider HMA however this does not appear to have been the case. On this basis, it can not be said that the duty to cooperate has been met and the Local Plan cannot be found sound.

As a result of this, Guildford's approach will only continue to exacerbate issues of unaffordability and increasing unmet needs for the HMA. That no consideration has been taken to dealing with the existing unmet needs is concerning. GBC by reducing their housing requirement are contributing to these unmet needs and this approach cannot be justifiable in the face of increasing unaffordability and demand. The suitability of the figures used to determine the new housing requirements are questionable in their soundness. An appropriate strategy, if the OAN were to be 654 dpa, would be to provide for an additional contribution towards the unmet needs in the HMA. The Inspector at the Waverley examination has recommended that a 150 dpa contribution be made towards these. Whilst it is accepted that Guildford's LP will be examined separately, the needs of the HMA are an important factor to which significant weight should be afforded. Therefore, Guildford should be taking consideration to a similar provision to be included in the Local Plan. On this basis, it cannot be said that the plan has been positively prepared as require by the NPPF and therefore cannot be found sound.
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

Comment ID: pslp17q/600  Respondent: 15263905 / Philip Walker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: pslp17q/602  Respondent: 15264001 / Robert Peake  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: SQLP16/557  Respondent: 15266785 / Trenfold Property Limited and Countryside Properties Limited  Agent:  Boyer (Michelle Thomson)

2.14 As set out in paragraph 182 of the NPPF Local Planning Authorities are required to demonstrate that they have positively prepared their Local Plan. This should include seeking to meet “unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”.

2.15 Paragraph 181 of the NPPF also notes that Local Planning Authorities “will be expected to demonstrate evidence of having effectively cooperated to plan for issues with crossboundary impacts”.

2.16 Furthermore, they must also be “sure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area”.

2.17 Paragraph 4.36 of the Duty to Co-operate Topic Paper prepared by the Council notes that Guildford Borough Council alongside Woking and Waverley Council have jointly signed up to a Memorandum of Understanding (MoU). “This includes an agreement to prepare an up-to-date joint SHMA together with a commitment to review whether this needed updating every three years”. In addition the MoU also included a “commitment to continuing to work jointly on other relevant cross boundary matters”.

2.18 The decision of Guildford Borough Council to prepare an Addendum to the joint West Surrey SHMA (2015) is clearly contrary to the MoU and the commitment to “work jointly”. The Addendum Report prepared by Guildford fails to take into account the wider HMA within which both Woking and Waverley Council lie.

2.19 It is clearly apparent from the nature of the Addendum Report prepared that Guildford Borough Council has therefore failed to meet the requirements of paragraph 47 of the NPPF. In that they have failed to consider the wider housing market area (HMA). The Addendum Report is therefore not considered to be consistent with national policy.

4.8 As also outlined in Section 3 of these representations Guildford Borough Council have a duty to co-operate and must be able to demonstrate this as part of the independent examination of their Local Plan.

4.9 Woking Borough Council lies within the same HMA as Guildford Borough Council and has a significant unmet need. In spite of this Guildford Borough Council are currently proposing to assist Woking with none of this unmet need.

4.10 The ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017)’ therefore does not currently satisfactorily demonstrate that it has been prepared in a positive manner. The Council should seek to address this matter before the emerging Local Plan proceeds to Examination.
Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green /belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

Attached documents:

Comment ID: SQLP16/500  Respondent: 15275041 / Cora Dennis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

I object to the local plan,

Duty to cooperate? This planning was snuck in at the last minute with no consolatation to local residents. Your questionnaire is in jargon terms to me so you are purposefully making it difficult for residents to object.

Attached documents:

Comment ID: SQLP16/506  Respondent: 15275073 / Sean Lightfoote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

I object on the basis that the attempt to shortcut the process using Regulation 19 and holding the meeting virtually in secret is not a cooporative approach to the situation.

Attached documents:

Comment ID: SQLP16/633  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)
Whilst we have not considered the Duty to Cooperate in any great detail, we note that the Council jointly commissioned a West Surrey Strategic Housing Market Assessment (SHMA) exercise with the neighbouring local authorities of Woking and Waverley. This SHMA set the annual housing requirement (objectively assessed need) for each of these three local authorities. The fact that Guildford intend to fall short of meeting this annual OAN figure during the first four years of its Plan raises concerns that they are likely to fail in meeting their Duty to Cooperate on an ongoing basis, particularly in light of historical shortfalls in housing delivery and the uncertainty over the deliverability of strategic sites. This could lead to the neighbouring local authorities facing pressure to deal with the shortfall when it arises.

It is also unclear whether the Council has sufficiently co-operated with neighbouring local authorities in order to determine how site allocations in each borough might impact on existing highways infrastructure.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/226</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
<td>Answer: (No)</td>
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</table>

In our earlier representation, we set out our concerns that Guildford's intention to fall short of meeting the annual OAN figure during the early years of its Plan would be likely to result in them failing to meet their Duty to Cooperate on an ongoing basis. This is now reinforced by the approach being taken in unilaterally reducing the OAN figure, despite recent indications from the Inspector on the Waverley Plan that Guildford may have to meet some of Woking's need.

We therefore believe that the Council's approach - particularly over recent months in commissioning their own SHMA addendum without involving the other local authorities in the HMA area - is highly likely to be found to be wanting from a Duty to Cooperate perspective.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/587</th>
<th>Respondent: 15282241 / Elena Papazoglou</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td>Answer: (No)</td>
<td></td>
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</tbody>
</table>

Plans are not co-operating with the fact this land is legally designated greenbelt. I object to any building on land designated as GreenBelt

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/617</th>
<th>Respondent: 15282593 / Anne Young</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td>Answer: (No)</td>
<td></td>
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</tbody>
</table>

In my opinion failing to produce evidence for the basics of the plan is not cooperation.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1649</th>
<th>Respondent: 15299201 / Samira Abdullah</th>
<th>Agent:</th>
</tr>
</thead>
</table>
Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green Belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

Attached documents:

Comment ID: pslp17q/537  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

Comment ID: SQLP16/659  Respondent: 15304929 / Rosemary Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

Ido not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.
This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

Attached documents:

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Comment ID: pslp17q/635  Respondent: 15340929 / Claire Smylie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

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Comment ID: SQLP16/794  Respondent: 15367361 / Greg Ganjou  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

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Attached documents:

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<tr>
<th>Comment ID: SQLP16/801</th>
<th>Respondent: 15368129 / Sharon Cork</th>
<th>Agent:</th>
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**Comment ID:** SQLP16/818  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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**Comment ID:** pslp17q/619  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

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Comment ID: SQLP16/821  Respondent: 15369185 / Keith, S. Jane and Natasha Liddell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

5. QUESTION 4: Duty to cooperate

We do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to Cooperate and particularly with regards to the provision with a new 8FE secondary school at site A46.

Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004 (as amended) and paragraphs 178-181 of the National Planning Policy Framework create a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan. The body of evidence in the draft Local Plan does not provide objective information regarding co-operation with stakeholders, such as SCC, education professionals, communities and infrastructure providers to develop and demonstrate the need for a school at A46.

Attached documents:

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Comment ID: SQLP16/832  Respondent: 15370593 / A Gee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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**Comment ID:** SQLP16/847  **Respondent:** 15379969 / Teresa Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

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**Comment ID:** SQLP16/866  
**Respondent:** 15381249 / Helen Poyntz  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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**Comment ID:** SQLP16/875  **Respondent:** 15386017 / Gareth Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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**Comment ID:** pslp17q/623  **Respondent:** 15386017 / Gareth Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

Section page number 990  Document page number 990
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Comment ID: SQLP16/906  Respondent: 15389697 / Oliver Stewart  Agent:

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<th><strong>Respondent:</strong></th>
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A46. A47. A50.
I object to any building between Westwood Lane and glaziers lane because they are both too narrow, and each one has a lethal railway bridge. Any increase in local traffic would greatly increase the likelihood of more motor accidents on these two lanes. There have been deaths at both bridges in past years.

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<th>Comment ID: SQLP16/947</th>
<th>Respondent: 15405857 / Raymond Mackay</th>
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- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

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Attached documents:

Comment ID: SQLP16/980  Respondent: 15422529 / David Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

24.D. Question 4: Duty to cooperate

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Attached documents:

Comment ID: SQLP16/999  Respondent: 15426305 / I C Dean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()
Question 4: Duty to cooperate. I have no information on which to form an opinion.

Attached documents:

Comment ID: SQLP16/1008  Respondent: 15427617 / Ken Scotland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

20.A. Question 4: Duty to cooperate

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Attached documents:

Comment ID: SQLP16/1054  Respondent: 15439585 / Bryan Handcock  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)
Local roads are not suitable for heavy traffic

Attached documents:

---

**Comment ID:** SQLP16/1080  **Respondent:** 15442049 / Ellouise Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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**Attached documents:**

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**Comment ID:** pslp17q/627  **Respondent:** 15442049 / Ellouise Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

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Attached documents:

Comment ID: pslp17q/617  Respondent: 15448321 / Nicole Mapplebeck  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: SQLP16/1129  Respondent: 15448353 / Emily Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

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**Comment ID:** SQLP16/1953  **Respondent:** 15460737 / Donna Collinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

We welcome the approach adopted by local councils in Surrey of working together based on Memoranda of Understanding, although we note that neighbouring Waverley has not signed.

We are concerned that the Strategic Housing Market Area is not meaningful and omits nearby communities in Hampshire, such as Rushmoor, that are very important for planning housing, employment and transport in Guildford. Further, a strategic approach to Green Belt planning and commuting requires cooperation with more distant communities with transport and economic links. Aldershot, Frimley and Portsmouth are all relevant to Guildford.

Within the somewhat arbitrary Strategic Market Area, differences in approach have a distorting effect, as seen in Guildford’s Sustainability Appraisal.

Several large developments are proposed in neighbouring Plans that would have a very significant effect on Guildford and it is of concern that the impact of these has not been specifically addressed as part of Guildford’s Local Plan process.
There is no discussion in the transport papers about the traffic generated by Dunsfold or Cranleigh wanting to use Guildford’s roads. For example, the A281 is forecast to be far over capacity at Millbrook. Guildford BC is saying, in its views on the Town Centre Master Plan and the Transport Strategy, that it wants to opt for Scenario 2 which means a reduction of say 30% in capacity. So what will happen to traffic from Waverley that wants to go to the hospital or University? Will it try using the B3000? This does not appear to have been thought about.

Attached documents:

Comment ID: SQLP16/1196  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

24.D. Question 4: Duty to cooperate
Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

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**Attached documents:**

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**Comment ID:** SQLP16/1208  **Respondent:** 15466113 / Tim Grey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:**

1.A. Question 4: Duty to cooperate

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**Comment ID:** SQLP16/1221  **Respondent:** 15474849 / Timothy Yorath  **Agent:**
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Attached documents:

Comment ID: pslp17q/648  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: SQLP16/1247  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: SQLP16/1761  Respondent: 15478209 / Sally Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: pslp17q/64  Respondent: 15478209 / Sally Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

Non-plan Items– My Objections
Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion and their effects on public health) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

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Attached documents:

Comment ID: SQLP16/1283  Respondent:  15481409 / Amy F Corstin  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

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<th><strong>Respondent:</strong> 15483713 / Claire Walker</th>
<th><strong>Agent:</strong></th>
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1. I object to GBC not appearing to liaise with other neighbouring boroughs to fully understand the massive implications of development in the South East.

Continuing to work in silo's will bring chaos to the already over populated and polluted South East.

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This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent
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In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

Attached documents:

**Comment ID:** SQLP16/1355  **Respondent:** 15502241 / Richard Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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Attached documents:

**Comment ID:** SQLP16/1336  **Respondent:** 15504001 / Margaret Banks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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**Attached documents:**

**Comment ID:** pslp17q/584  **Respondent:** 15506401 / Alicia Robinson  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**Attached documents:**

**Comment ID:** SQLP16/1721  **Respondent:** 15570817 / Tom Edelsten  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.
Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flows. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burgham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

Comment ID: pslp17q/523  Respondent: 15570817 / Tom Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: SQLP16/1719  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

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Attached documents:

Comment ID: SQLP16/1387  Respondent: 15571617 / Bruce Garbutt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

I object that the Plan has not complied with the Duty to co-operate by the Council consistently refusing to provide the basis of the SHMA

Attached documents:

Comment ID: SQLP16/1407  Respondent: 15571617 / Bruce Garbutt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

Question 4: Duty to cooperate. There is no evidence on which to base a decision. This is a matter for an independent assessor to judge in possession of a fuller picture than has been revealed hitherto.

Attached documents:

Comment ID: SQLP16/1397  Respondent: 15571937 / S Bennell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

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This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

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This is not cooperation by any definition.

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I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

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Comment ID: pslp17q/632  Respondent: 15571937 / S Bennell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

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Comment ID: SQLP16/1453  Respondent: 15581665 / Laura Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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### Comment ID: SQLP16/1455  **Respondent:** 15581761 / Peter Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate  

**Answer:** ()

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### Comment ID: SQLP16/1468  **Respondent:** 15582593 / Dermot McMullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate  

**Answer:** (No)

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Attached documents:

Comment ID: SQLP16/1503  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

Comment ID: SQLP16/1518  Respondent: 15585601 / Sophie Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: (No)

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<th>Comment ID: SQLP16/1524</th>
<th>Respondent: 15586017 / C Maslin</th>
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Cooperation is a two-way street. Guildford objected to Waverley’s plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking’s unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green /belt, which is protected by the NPPF. Greed is not ‘an exceptional circumstance’ and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

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<th>Comment ID: SQLP16/1557</th>
<th>Respondent: 15588929 / Alex Hutchings</th>
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**Comment ID:** SQLP16/1580  **Respondent:** 15590273 / Eunja Madge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

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The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

Attached documents:

---

**Comment ID:** SQLP16/1638  **Respondent:** 15601057 / Chris Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:**

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Attached documents:

Comment ID: SQLP16/1660  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green/belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

Attached documents:

Comment ID: SQLP16/1679  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

Attached documents:

Comment ID: SQLP16/1683  Respondent: 15604289 / Lesley Pitt   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate. This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough. The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan. Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition. In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

Attached documents:

Comment ID: SQLP16/1687  Respondent: 15607553 / Penelope Gillmore   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

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Attached documents:

**Comment ID:** SQLP16/1691  **Respondent:** 15608289 / Olivia Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** (

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**Attached documents:**

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**Comment ID:** pslp17q/556  **Respondent:** 15608801 / Beth Fuller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**Attached documents:**
**G. Duty to Cooperate – My Objections**

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**Attached documents:**

**Comment ID:** SQLP16/1717  **Respondent:** 15612481 / Gillian Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences.
This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1725</th>
<th>Respondent: 15615745 / Nicholas Thompson</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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<tr>
<th>Comment ID: SQLP16/1735</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
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Attached documents:
### Comment ID: SQLP16/1734  Respondent: 15618337 / Matthew Pitt  Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

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**Attached documents:**

### Comment ID: SQLP16/1740  Respondent: 15619073 / Paul Collins  Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

COMMENT: Unable to comment due to insufficient information or published evidence pertaining to same at this date.

**Attached documents:**

### Comment ID: SQLP16/1746  Respondent: 15623745 / Stella May  Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green Belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.
Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

Attached documents:

Comment ID: SQLP16/1848  Respondent: 15650369 / Stephanie Dean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()
There is no evidence on which to base a decision. This is a matter for an independent assessor to judge in possession of a fuller picture than has been revealed hitherto.

Attached documents:

Comment ID: SQLP16/1894  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Answer: ()
Yes. It appears through the supporting evidence base that collaborative working with neighbouring authorities has been demonstrated.

Attached documents:

Comment ID: pslp17q/436  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: (No)
By reducing the housing requirement in the plan to 12,426 new homes the Plan is unsound as the Council have failed to plan positively in relation to meeting the needs of neighbouring authorities.

We continue to have concerns regarding the Guildford Borough Council’s (GBC) co-operation with its partners in the Housing Market Area. Whilst Waverley BC is seeking to meet its needs, Woking BC continue to plan on the basis of their adopted Core Strategy. Woking’s Core Strategy sets out its housing requirement as 292 dpa, this is 225 units below the OAN as established in the 2015 West Surrey Strategic Housing Market Assessment. As such there is clearly a significant amount of unmet housing needs within Woking and that consideration needs to be given within the HMA about how this unmet need is going to be addressed. This issue was raised by the inspector as part of the examination of the Woking BC Core Strategy.

There is no evidence to suggest that GBC has considered the matter of Woking’s unmet need and as such the plan fails to pass the soundness test in terms of its duty to cooperate with neighbouring authorities.

Attached documents:

Comment ID: SQLP16/1916  Respondent: 15670785 / Mr and Mrs Poulsom  Agent: Vail Williams LLP (Jane Terry)
No.

The actions taken by the Council to conform to the Duty to Co-operate are set out in the Topic Paper Duty to Cooperate, June 2016.

In relation to the specific issue of housing, reference is made to the Housing Delivery Topic Paper which discusses the approach to meeting needs. A Memorandum of Understanding on housing delivery has been signed between Guildford, Woking and Waverley which recognises that there is unmet need within the HMA and commits the three authorities to continued future joint working to ensure housing needs across the HMA are met in full. It states that the Council is committed to continuing to explore with Waverley and Woking those areas which are most likely to lead to positive outcomes. The Topic Paper goes on however, to state that Guildford does not consider it can sustainably accommodate any unmet need arising from Woking (or from Waverley should an unmet need be identified in the future).

The Localism Act establishes that the outcome of the Duty to Co-operate should lead to effective policies on strategic cross boundary matters: It is the outcome rather than the process that is critical to complying with this legal obligation. In relation to the requirement that local plans are prepared to meet objectively assessed needs, including unmet needs from neighbouring authorities, this statement is contrary to the Duty to Co-operate as it predicates how a positive outcome can be achieved.

Attached documents:

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**Comment ID:** SQLP16/1933  **Respondent:** 15678593 / Mole Valley District Council (Deborah Miles)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

**Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulation 19**

Thank you for consulting Mole Valley (MVDC) on the Draft Guildford Borough Council (GBC) Local Plan.

Given the size of the Wisley Airfield site it has the potential to have an impact on Mole Valley District, and as such we have an interest in the development of this site.

Attached documents:

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**Comment ID:** SQLP16/1945  **Respondent:** 15679137 / Turley (Hannah Bowler)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

Please see supporting report for more details

Attached documents:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: (Yes)

Insofar as it relates to 'The Barn, Effingham' site. Please refer to the accompanying separate representation submission report dated July 2016 for details.

Attached documents: [The Barn Effingham- Local Plan Reps (2).pdf (426 KB)]

Comment ID: SQLP16/1995  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: SQLP16/2000  Respondent: 15689793 / Gladman Developments (Mat Evans)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

The Duty to Cooperate and Unmet Housing Need

Our main concern, therefore, is if the Councils FOAHN is an underestimation, and if there are reasons why it cannot meet a higher FOAHN what implications does this have for the HMA and surrounding districts. We have been able to find no record of the discussions which may or may not have taken place under the Duty to Cooperate, and we would expect to do so. Nevertheless the point is it is vital for Guildford to fully understand its FOAHN, set out what it can meet and identify where any unmet need is being accommodate through conversations using the Duty to Cooperate.

If there is found to be a shortfall we would wish to bring to the Councils attention the case of Warwick District and the Coventry HMA. The examination of the Warwick EIP has been in effect paused since May 2015 because of the level of unmet need within the HMA1. The inspector into the Warwick Local Plan was so concerned by the failure of the local authorities to reconcile the issue of unmet housing need that at one point he was proposing the plan should be withdrawn as he considered it unsound. Since this time that HMA has made significant strides on joint working with regard housing numbers, SHLAA assessment and green belt release. The HMA contains significant levels of green belt.

Local Plan Expert Group (LPEG)
The government remains concerned that the Local Plan process remains flawed, overly long and is leading to plans and HMAs which are failing to adequately plan for their housing needs. The late of which is particularly prevalent in the south east. As a response LPEG was commissioned to look at ways in which the Local Plan system could be improved. The report was published in March 20162 and was the subject of a consultation which ran until 27th April 2016.

LPEG are quiet clear in their recommendation that the Duty to Cooperate has failed to deal with the unmet housing needs emanating from certain areas of the country. LPEG do not underestimate the difficulties faced by local authorities in planning to meet housing need however they recommend a series of changes, in Appendix A - section 5 to the main report, to ensure that HMAs cannot simply pass the buck on housing needs. These include:-

- Establishing coordinated HMA boundaries;
- Strengthening the Duty to Cooperate and including and adding the following wording to the tests of soundness in para 182 of the NPPF;
  
  the product of joint working between authorities is expected to be agreement on the distribution of full OAN unless there is clear and convincing agreed evidence that the adverse effects of meeting the need in full would significantly outweigh the presumption that the need should be met;
- plan making authorities who do not plan to meet their own OAN are expected to identify in their submitted plans how those needs are likely to be met and to proactively work towards achieving the meeting of those needs – this should involve, for instance,
- testing the assertions of adjacent authorities who claim an inability to meet those unmet needs and challenging that assertion if capacity is considered to be available to meet needs;
- formally requesting that adjacent authorities meet those needs; and
- making representations to adjacent authorities’ plans to meet those needs in the event that agreement has not been reached.
- where unmet needs are identified as a result of this process, planning authorities requested to meet needs from adjacent authorities whether within the same HMA (or not) will be expected to treat that unmet need as part of their own OAN and to apply the same NPPF tests as they do to their own OAN in assessing their ability to meet those needs within their local plan

It is acknowledged that the LPEG recommendations have not yet been formally accepted by government, however it is clear that the problems of unmet need in and bordering HMAs is a significant problem for many local plans at present. We have put forward the example of Warwick where an Inspector has properly sought to grapple with these significant issues, we believe strongly that a similar approach must be taken in Guildford and the surrounding districts. Too many plans have already been passed without any significant work undertaken to address the levels of unmet need being generated and where the housing need is to be accommodated, the problem is only likely to grow, and starting to tackle it now is the only sound approach to take in preparing a sound, future proof Local Plan. LPEG clearly state how they think this can be undertaken, and it is likely that the full impacts of what LPEG proposes will start to be felt imminently. The Council should therefore take this opportunity to start to consider these implications and consider further where its unmet need is likely to go.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/416</th>
<th>Respondent: 15689793 / Gladman Developments (Mat Evans)</th>
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<td>Answer: (No)</td>
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**4 DUTY TO COOPERATE**

4.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the previous withdrawn plan, and 13 other Local
Plans since 2011, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

4.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration1, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Hart must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

4.1.3 The Local Plan as written clearly fails to meet the Duty to Cooperate. Guildford has failed to adequately, alongside its HMA wide partners, meet the unmet housing needs of the HMA. In the ongoing examination of the Waverley Local Plan, the Inspector has indicated that Waverley will be required to take 50% of Woking’s currently identified unmet housing need. Guildford must address how it will make a contribution towards meeting the other 50% of unmet housing need in the HMA. Furthermore, it must be remembered that this represents 50% of the currently identified figure, it is highly likely that this figure is a significant underestimation of the unmet housing needs of Woking and thus the HMA. The real figure that Guildford and Waverley will have to consider is therefore likely to increase.

4.1.4 It was apparent from the Waverley Local Plan examination that there was significant disagreement between the HMA wide authorities of Guildford, Woking and Waverley as to who should be taking what level of need. The government has made clear through the Housing White Paper that the current situation, where HMAs pass unmet need from authority to authority is untenable. The Guildford Local Plan contains insufficient evidence to justify the position of not contributing towards meeting HMA wide unmet needs, as such we do not consider that the plan soundly discharges the Duty to Cooperate.

**Attached documents:**

**Comment ID:** pslp17q/57  **Respondent:** 15711393 / Kirk Georgiou  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

**Non-plan Items – My Objections**

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

**Cumulative impact of changes – My Objections**

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of **benefit** to the Clandons and indeed the **cumulative** effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

**Duty to Cooperate – My Objections**

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which
overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green
Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to
residents.

Attached documents:

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Comment ID: pslp17q/573  Respondent: 15714817 / Vicky Dowling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to
residents.

Attached documents:

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Comment ID: SQLP16/2108  Respondent: 15724353 / Arvnid Parmar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Answer: ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
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The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant
to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent
on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge
into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned
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The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views
of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of
developers and central government.

Attached documents:
QUESTION 4: DUTY TO COOPERATE

Our client have no specific comments to make on the Duty to Co-operate at this stage.

Attached documents:
The fact remains that GBC has not only failed to take account of neighbouring unmet need, it has actively and significantly:

- Reduced its Objectively Assessed Need (OAN) against the current of acute housing need.
- Reduced its proposed housing land supply despite historic and current under-performance of housing delivery, and;
- Discounted smaller housing sites which are well placed to meet the needs of neighbouring authorities and communities, despite weighting the reduced housing delivery to the back end of the Plan period.

We strongly maintain that the settlement of Farncombe (with its shared boundary with GBC) represents a suitable, sustainable and accessible opportunity to help accommodate the unmet housing needs of both authorities in just the way that the duty to cooperate is designed to facilitate. Land South of New Pond Road (site No. 80) is ideally placed to assist Guildford Borough Council meet its housing land supply target whilst also helping to meet the acute needs of communities that share a border with Waverley borough in a geographic area which is well served by a range of existing services and amenities including a railway station which links Farncombe to Guildford (just 6 minutes travel time) and which is served by established bus routes.

Attached documents: [Pond Farm_Draft Regulation 19 Reps.docx](#) (1.2 MB)

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**Comment ID:** pslp17q/56  **Respondent:** 17283297 / John Ball  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:**()

### Non-plan Items– My Objections

12) Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

13) Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

### Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

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Yours sincerely,

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/69</th>
<th>Respondent: 17296417 / Simon Wilcockson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017</td>
<td>Question 4: Duty to cooperate</td>
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Attached documents:

Comment ID: pslp17q/99  Respondent: 17303553 / Anita Fitchie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Attached documents:

Comment ID: pslp17q/103  Respondent: 17303713 / Andrew Fitchie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: (No)

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Attached documents:

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**Comment ID:** pslp17q/136  **Respondent:** 17323265 / Simon Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** (No)

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Attached documents:

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**Comment ID:** pslp17q/197  **Respondent:** 17341057 / Sustainable Land Products Limited (Owen Davies)  **Agent:** Roger Daniels

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** (No)
Although Guildford Borough Council has generally complied with the statutory procedures for preparing the Local Plan, it has not complied fully with the 'Duty to Co-operate' which is a statutory requirement in Section 110 of the Localism Act 2011; particularly in relation to housing provision and Green Belt review.

Please refer to the accompanying report from Sustainable Land Products (Tangley Place Concept Statement)

Comment ID: pslp17q/199  Respondent: 17341057 / Sustainable Land Products Limited (Owen Davies)  Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: (No)

The Duty to Co-operate Topic Paper records ongoing discussions with neighbouring districts in Surrey on the production of a Local Strategic Statement (LSS). It also describes co-operation on a joint Strategic Housing Market Assessment (SHMA) but it does not point to any substantive agreement with neighbouring councils to ensure that the delivery of housing will meet the objectively-assessed needs of the Housing Market Area (HMA) throughout the plan period.

Paragraph 4.49 of the Topic Report refers to a Statement of Common Ground in which the three neighbouring authorities of Guildford, Woking and Waverley have acknowledged that there is unmet need within the HMA, but the Statement simply 'commits the three authorities to continued future joint working to ensure that as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full.'

The NPPF is explicit, in paragraphs 47 and 182, that local planning authorities should meet the full objectively-assessed need for housing in the housing market area, subject to other considerations, and should consider unmet housing needs in neighbouring authorities when formulating their local plan strategy. This has not been done by Guildford and its neighbouring authorities.

The Topic Report also concedes (in paragraph 4.93), in relation to Green Belt review: ‘As the broad methodology that underpins the study was developed prior to the NPPF and Localism Act, we did not engage with neighbouring authorities at that time.’

In relation to both housing and Green Belt review, it is therefore clear that the requirements of the Duty to Co-operate have not been met: in terms of the legislation in Section 110 of the Localism Act 2011; in terms of the policies of the National Planning Policy Framework; or in terms of the advice in Planning Practice Guidance.

Please refer to the accompanying report from Sustainable Land Products (Tangley Place Concept Statement) for further details.


Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: (No)

1 Introduction

1.1 This statement of written representation prepared by Planning and Design Group (UK) Limited ("P&DG") is made on behalf of our client Rowen Properties (London) Ltd in response to Guildford Borough Council’s ("the Council")
consultation on the Proposed Submission Local Plan: Strategy and Sites, 2017 (‘the Proposed Local Plan’) for the
borough.

1.2 Our representation is made in the context of seeking to work with the Council to ensure that an effective, sound and
deliverable plan for the area is achieved. These representations have regard to the land that Rowen Properties control in
Badshot Lea, Farnham within close proximity to the Council’s western boundary with Waverley Borough Council.

2 Executive Summary

2.1 This representation responds specifically to question four of the Council’s consultation exercise, in particular
addressing compliance with the legal duty to cooperate. In doing so we will also draw and make comment on wider
evidence presented by the Council.

2.2 It is considered that the Council, operating within the context of the West Surrey Housing Market Area (HMA), have
not acted to fully comply with the duty to cooperate. Specifically, that evidence presented around the duty relating to
housing delivery represents only a limited technical exercise and contains little contingency for meeting existing and
potential unmet housing need locally. Whilst the evidence in the recent duty to cooperate thematic paper is recognised it
is felt far more needs to be addressed on the matter.

2.3 In light of the apparent land constraints across the borough and a high reliance on a limited number of backloaded
strategic sites to address housing need, a more diligent contingency is expected from the Council through the duty to
cooperate. This should cover the shared and agreed approaches to delivering any and all unmet housing need in the event
of under delivery across the boundaries of the HMA. Furthermore, it is considered that detailed conversations should be
had with Waverley Borough Council about this issue prior to the adoption of the Council’s Local Plan. This is on the
basis that Waverley may need to adopt a proportion of Guildford’s unmet housing need.

Attached documents:

Comment ID: pslp17q/319  Respondent: 17415009 / Lightwood Strategic (Lighwood Strategic)  Agent: Roger
Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: (No)

Although Guildford Borough Council has generally complied with the statutory procedures for preparing the Local Plan,
it has not complied fully with the ‘Duty to Co-operate’ which is a statutory requirement in Section 110 of the Localism
Act 2011; particularly in relation to housing provision and Green Belt review.

Attached documents:

Comment ID: pslp17q/321  Respondent: 17415009 / Lightwood Strategic (Lighwood Strategic)  Agent: Roger
Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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The NPPF is explicit, in paragraphs 47 and 182, that local planning authorities should meet the full objectively-assessed need for housing in the housing market area, subject to other considerations, and should consider unmet housing needs in neighbouring authorities when formulating their local plan strategy. This has not been done by Guildford and its neighbouring authorities.

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Attached documents:

<table>
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<tr>
<th>Comment ID: pslp17q/354</th>
<th>Respondent: 17426113 / Home Builders Federation (Mark Behrendt)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
<td>Answer: (No)</td>
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By reducing the housing requirement in the plan to 12,426 new homes the Plan is unsound as the Council have failed to plan positively in relation to meeting the needs of neighbouring authorities.

We continue to have concerns regarding the Guildford Borough Council’s (GBC) co-operation with its partners in the Housing Market Area. Whilst Waverley BC is seeking to meet its needs Woking BC continue to plan on the basis of their Core Strategy. Woking’s Core Strategy sets out its housing requirement as 292 dpa, this is 225 units below the OAN as established in the 2015 West Surrey Strategic Housing Market Assessment. As such there is clearly a significant amount of unmet housing needs within Woking and that consideration needs to be given within the HMA how this unmet need is going to be addressed. This issue was raised by the inspector as part of the examination of the Woking BC Core Strategy. In his report he stated that:

“Whilst the submitted CS does not plan to meet the objectively assessed housing needs of the Borough, I am mindful that the NPPF indicates that the aspiration to meet housing need is dependent upon consistency with other parts of the Framework. With this in mind and as evidenced by the SA, the Council has considered alternative levels of housing provision, for example, its Option 3 which considered the provision of 594 new dwellings per year.”

As there is still a significant amount of unmet need within the HMA it is therefore surprising that the Council has looked to reduce its plan overall requirement by 1400 homes. This is also an issue considered by the inspector at the recent examination hearings for the Waverley Draft Local Plan. During these hearings the Inspector clearly indicated that he considered it appropriate for Waverley and Guildford to accommodate the unmet need from Woking.

Given these wide spread concerns we would have thought that even if a reduction were appropriate then the Council would have considered the wider needs across the HMA before taking such a decision. Given that the SHMA addendum has been solely commissioned by GBC it would appear that the decision has been made solely on the basis of Guildford’s needs without any consideration of wider needs across the HMA.

The Housing Topic Paper 2017 does consider the issue of unmet need in relation to the reduced housing requirement. However, its position within this topic paper relates to the Council’s consideration as to the relative appropriateness of using specific allocations to address unmet needs from other authorities. In particular the Council focuses on the potential adverse impacts in relation to some allocations. Further deliberation doesn’t appear to have been given to the benefits of
meeting the wider housing needs of the HMA given the level of need and significant affordability issues identified in the West Surrey SHMA.

We therefore remain concerned that there continues to be a significant level of unmet need across the HMA. In addition there does not appear to be any commitment from Guildford or Waverley with regard to meeting Woking’s unmet housing needs. In fact it would appear that GBC are seeking to do the opposite by reducing their own housing requirement. This situation was addressed by the Inspector during of the recent examination in public of the Waverley Local Plan. During the hearing the inspector outlined his concern that there was unmet need within the HMA as a result of Woking being unable to meet their housing needs in full. As a result of this concerns he proposed that half of this unmet need, circa 150 dwellings per annum, be met by Waverley. Whilst recognising that the Guildford Local Plan would be examined separately and it would be for that Inspector to draw their own conclusions he suggested that Guildford adopt a similar approach to take account of Woking’s unmet housing need. We would endorse the Inspector’s comments and recommend Guildford increase their housing requirement to include a proportion of Woking’s unmet needs.

As we recommended in our previous response we think that all three Councils should have looked at preparing a joint local plan or, at the very least, had a clear, co-ordinated and shared approach to considering the delivery of sufficient sites to meet housing needs for the HMA. At present this commitment still remains vague and does not indicate that the plan has been positively prepared as required by the NPPF.

Attached documents:

Comment ID: psp17q/534  Respondent: 17452673 / Philip and Maureen Blunden  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Attached documents:

Comment ID: psp17q/522  Respondent: 17490177 / Fabia Dyer  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: pslp17q/525  Respondent: 17490209 / Elizabeth Ball  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

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Attached documents:

Comment ID: pslp17q/524  Respondent: 17490241 / David Harland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: pslp17q/526  Respondent: 17490369 / Miriam Edelsten  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”
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Attached documents:

Comment ID: pslp17q/532  Respondent: 17490561 / Derek Gillmore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: pslp17q/533  Respondent: 17490593 / Emily Edwards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()

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Attached documents:

Comment ID: pslp17q/539  Respondent: 17490753 / David Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Answer: ()
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<th>Comment ID: pslp17q/541</th>
<th>Respondent: 17490785 / Mary Ball</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
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<tr>
<th>Comment ID: pslp17q/545</th>
<th>Respondent: 17490881 / David Smylie</th>
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<tr>
<th>Comment ID: pslp17q/561</th>
<th>Respondent: 17491297 / Sonja Freebody</th>
<th>Agent:</th>
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<tr>
<th>Comment ID:</th>
<th>pslp17q/562</th>
<th>Respondent:</th>
<th>17491329 / Maura Dearden</th>
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<th>Comment ID:</th>
<th>pslp17q/569</th>
<th>Respondent:</th>
<th>17491425 / Moira Maidment</th>
<th>Agent:</th>
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</table>

**G. Duty to Cooperate – My Objections**

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

### Attached documents:

<p>| Comment ID: | pslp17q/566 | Respondent: | 17491489 / Margaret Perkins | Agent: |</p>
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<th>Comment ID: pslp17q/578  Respondent: 17491745 / Colin Marshall  Agent:</th>
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<th>Comment ID: pslp17q/579  Respondent: 17492801 / Stephen Fort  Agent:</th>
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Attached documents:

Comment ID: pslp17q/615  Respondent: 17495105 / Simon Chambers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:

Comment ID: pslp17q/620  Respondent: 17495393 / Samantha Gilchrist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Answer: ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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Attached documents:
### Comment ID: pslp17q/652  Respondent: 17507713 / T. A Trusler  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

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### Comment ID: SQLP16/1420  Respondent: 17969537 / N Giles Ltd (Sir or Madam)  Agent: Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Answer:** ()

It is not clear how the Duty to Cooperate has identified any unmet needs arising from neighbouring constrained authorities such as Waverley Borough Council and as such it cannot be concluded that the Duty to Cooperate has been complied with.

### Comment ID: pslp17q/35  Respondent: 17991873 / Guildford Borough Council (Economic Deve (Sir or Madam)  Agent: MADDOX (Matt Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Answer:** ()

With regard to the proposed changes to the plan, do you consider the Proposed Submission Local Plan: strategy and sites (2017) as a whole has complied with the Duty to cooperate?

Local planning authorities have a duty to co-operate on strategic planning issues that cross authority boundaries as set out within the Planning and Compulsory Purchase Act 2004 (as amended) and NPPF. The failure to demonstrate compliance with the duty to co-operate would result in the plan not being legally compliant.

The Council’s Topic Paper, Duty to Cooperate, which accompanies the Proposed Submission Local Plan, indicates that the Council has been in discussions with neighbouring authorities as part of the preparation of the Plan. To ensure compliance with the Duty to Cooperate, we recommend that the Council continue to co-ordinate with neighbouring authorities in the delivery of this Local Plan and support the continuation of this through the life of the plan.
Total records: 424.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Question 5 (2016) - The examination
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

**Question 5 (2016):** 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?

**Question N/A (2017):** [This question was not asked in 2017]

**Comment ID:** SQLP16/2063  **Respondent:** 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  

**Answer:** ()

Guildford Residents Association (GRA) has

- engaged positively in the Local Plan process from the outset,
- agreed “Aspirations for Guildford” and Local Plan consultation responses with the support of 26 Residents Associations and four Parish Councils,
- encouraged and supported residents to participate in the Plan-making process
- through contributions from residents groups, raised funds to commission an expert to review the SHMA, and
- drawn on the knowledge of environmental, planning, engineering, flood risk management, economic, commercial and transport experts to inform its contributions.

GRA does not consider the Plan to be sound for the reasons set out and we wish to make the case for changes we consider necessary to achieve this. These concerns, which relate to the overall approach, manifest themselves in policy throughout the Plan. Hence, our interest is overarching rather than confined to specific issues.

We would like to participate in all matters at the inquiry on behalf of the many residents who have worked together to establish a collective voice through the GRA. We would also like to be accompanied by an expert witness for the SHMA and for transport-related matters.

**Attached documents:**

**Comment ID:** SQLP16/1384  **Respondent:** 8559297 / Holy Trinity Amenity Group (Robert Bromham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  

**Answer:** ()

If the Inspector decides to investigate issues we have raised we would like to participate in the Examination of these.

**Attached documents:**

**Comment ID:** SQLP16/2025  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  

**Answer:** ()

The Guildford Society has

- engaged positively in the Local Plan process from the outset,
• held public meetings (free of charge) to explain elements of the evidence base, plan and process so as to ensure as objective as possible an approach to responding to the Local Plan consultations.
• requested and obtained acceptance from the Director General of the Office for National Statistics that the population projections contained anomalies arising from the (important) transient student intakes in Guildford, 
• provided a contribution of some funds to help GRA commission an expert to review the SHMA, and 
• drawn on the knowledge of our four knowledge groups, planning, transport, design & heritage and local economy – all of which includes respected experts – to inform its contributions.

The Society would like to participate in all matters at the inquiry. We reserve our position in respect of independent experts we would wish to accompany us be accompanied by an expert witness for the SHMA and for transport- related in respect of specialist matters.

Attached documents:

Comment ID: SQLP16/1809  Respondent: 8562561 / Mrs C Sheard  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially

Attached documents:

Comment ID: SQLP16/553  Respondent: 8563169 / Send Parish Council (Debbie Hurdle)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

Send Parish Council wishes to appear and participate at the Examination and intends to be represented by its appointed Planning Consultant for the purpose of supporting its objections and recommended modifications and to respond to any proposals and further information proposed by Guildford Borough Council or the Inspector.

Attached documents:

Comment ID: SQLP16/400  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (No)

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

Attached documents:

Comment ID: SQLP16/401  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)
I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

Attached documents:

Comment ID: SLP16/1289  Respondent: 8573793 / Harry Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

I have put a great deal of work into understanding the highway assessment and associated issues. I have also requested additional information that was missing from the highways assessment and the associated model development and validation report receipt of this information may enable me to respond further on certain aspects.

Attached documents:

Comment ID: SLP16/965  Respondent: 8575585 / Ian Macpherson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Question 5
Examination
For personal reasons I am unable to participate in the examination.

Attached documents:

Comment ID: SLP16/29  Respondent: 8593185 / Niels Laub  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

I wish to participate in the Examination in order to explain, and if necessary, to provide supporting evidence, as to why the West Surrey SHMA is flawed and has inflated the objectively assessed housing need for Guildford.

Attached documents:

Comment ID: SLP16/1342  Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

See attached letter

Attached documents:
We wish to reserve the right to participate in the Examination in public. Given the extent of land interests Loseley Park has in the Borough we may wish to appear and speak on a range of policies, which we have commented on below.

Attached documents:

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1) Although the Parish Council acknowledges that the Borough has published much of their evidence and draft documents, together with providing roadshows and events to which the Parish Council have been invited, these have not been found to be helpful generally both by the Parish Council or by the residents of Normandy. The reason for this is:-

1. The opportunity to attend meetings where information is to be disseminated to parish councillors has almost always been notified too late i.e. within 2 weeks of the appointment.
2. Such meetings have often been fixed to take place during the course of the day.
3. When significant documentation has been put out for public consultation it has been sent out at the end of July with the 12 week period for consultation taking place over the summer holidays. This is traditionally at the time when most Parish Councils do not meet. This last period of consultation has ended on the 22 September leaving Parish Councils with little opportunity to meet and approve their consultation document; most Parish Council meetings are held at the end of the calendar month. Most Parish Clerks take the opportunity over August to take a long holiday. Most Parish Councils have only one clerk and often they are part-time.
4. The documentation supplied has been dense and couched in terminology not accessible to most, scattered throughout with acronyms.
5. Requests for more accessible information which could be circulated to our residents were basically ignored until we received 38 copies of the disc and a number of documents including the questionnaire on 6th and 8th September.
6. The Borough produces a newspaper which is delivered to every home. Nowhere in that did it outline it’s plans to build 13000 homes the large majority of which would be sited along the A323 corridor Ash into Guildford and A322 both roads which already suffer significant traffic problems. Had they done so the residents would have been alerted at an early stage. A summary of proposals would have been useful to all residents throughout the Borough. Instead the newspaper simply placed a PR spin on the process of consultation asking everyone to get involved.
7. The questions that the consultees have been asked to address are in some instances almost peripheral to the plans and leave insufficient space and opportunity for consultees to give full answer.

2) The Borough Council has failed to communicate effectively with residents because, although inviting them to a number of events, the information that has been given has been put before the residents on the basis of “this is to happen” rather than “we would welcome your comments”.

3) There has been an overreliance and an assumption that the residents of the Borough are IT literate to the extent required by the Borough. Where printed information is sought it is provided at considerable cost.

With particular reference to the consultation period that ends on the 22 September 2014.
1. The Parish Council have been asked to comment on a draft plan which proposes wide scale development based on a housing number in a SHLA which is presently under review. It is impossible in this Parish Council’s view to respond effectively to the consultation without this essential document being available.

2. The Borough Council seeks to obtain effective consultation on this document despite the fact that the maps provided for each Parish show changes to boundaries against a map that is just a blur of colour. It is impossible for the Parish Councils to assess where the settlement boundaries are to start and finish and how the affect of inset is supposed to affect the village.

3. The Borough Council has failed to indicate what level of density will be applied to the development in the Greenbelt areas. Again, it is impossible to effectively comment upon the proposals of the Borough Council without this information. In the Parish Council’s view it is in the interests of all that these density levels are fixed in the Plan.

4. The Borough Council is referred to the consultation code issued by the Government which is attached. 12 weeks is the minimum period over which a consultation should be held.

5. The Borough Council published their Sustainability Appraisal and Habitats Regulations Assessment on the 7th August with only a 6 week consultation offered alongside the consultation to which we respond. These are essential evidential documents underpinning the ‘Plan’ and should have been available at the outset.

Attached documents:

Comment ID: SLP16/576  Respondent: 8598049 / Environment Agency (Jonathan Fleming)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: (Yes)

As a statutory consultee we would be pleased to participate in the Examination.

Attached documents:

Comment ID: SLP16/1782  Respondent: 8598561 / Sarah Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

Having reviewed the Local Plan I am deeply disturbed that the Council has ignored concerns raised by Borough residents in the 2014 consultation, showing a clear agenda for development at any cost. It shows a complete lack of consideration for the impact of such extensive development in the most densely populated county (Surrey) and most densely populated region (South East) of England.

I object to the Council making last minute, significant changes to the plan, such as the Garlick’s Arch development in Send and addition of a major alteration/enlargement of the junction on the A3 at Burnt Common. There are also many other new sites and changes to the 2014 plan. Therefore, full consultation according to Regulation 18 is required, not the short cut form of Regulation 19.

It is also clear that that Plan’s consultation has been timed when many people take holidays, to minimise residents’ opportunity to fully review the extensive documentation and make any appropriate objections. As a result I have had to limit my comment to my local area rather than the Borough as a whole.

Attached documents:

Comment ID: SLP16/415  Respondent: 8599201 / Richard D Jarvis  Agent:
<table>
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I have an interest in participating in the Examination on transport issues, to present the interests of Guildford Residents Association.

**Attached documents:**

<table>
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<tr>
<th>Comment ID: SQLP16/1039  Respondent: 8604321 / Barton Willmore (Simon Potts)  Agent: Associate Vail Williams (Chris Wilmhurst)</th>
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<th>Comment ID: SQLP16/598  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:</th>
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West Clandon Parish Council wishes to express an interest in attending the examination. We wish to determine who will represent us nearer the event.

John Stone
Clerk

for West Clandon Parish Council

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<tr>
<th>Comment ID: SQLP16/170  Respondent: 8640353 / Julian Cranwell  Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> (Yes)</td>
</tr>
</tbody>
</table>

I would like to be involved, as I have devoted much energy to this matter over the past 3 years, and have had many interactions with the council. None of the objections I raised, in relation to the previous draft have been addressed.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/328  Respondent: 8687041 / Michael Aaronson  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
</tr>
<tr>
<td><strong>Answer:</strong> (Yes)</td>
</tr>
</tbody>
</table>
I wish to be able to provide the Inspector with evidence why the proposals for Normandy and Flexford (Policy/Site A46) are inappropriate and unsustainable.

Attached documents:

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**Comment ID:** SQLP16/989  **Respondent:** 8703585 / N J Axten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

I will support any group which intends to challenge the Local Plan eg. GGG

Attached documents:

---

**Comment ID:** SQLP16/24  **Respondent:** 8707553 / Stuart Farquharson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

Let me begin but stating that the contempt with which GBC has approached this consultation is absolutely disgusting. The views and thoughts of many of the villages and towns impacted but this farce of a plan having been whole sale ignored. Point in case Wisley Airfield. Planning Permission denied but it still remains in the local plan…why? At the end of Public meeting when the Chair stated not aware that her microphone was still switched on referred to the Public as a Rabble….says it all.

So I object wholesale to the local plan…specifically the villages of Horsley

Attached documents:

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**Comment ID:** SQLP16/392  **Respondent:** 8717921 / Helen Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

Yes I wish to participate in the examination particulary with regard to policy A35, P2 and P5, I1 and A36-41 inclusive

Attached documents:

---

**Comment ID:** SQLP16/628  **Respondent:** 8729217 / Karen Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

I would like to participate in the Examination. I have engaged positively in the Local Plan from the outset. I have coordinated the Save Hogs Back campaign from its inception and am very familiar with the arguments for and against developing the Blackwell Farm site (Policy A26). For the past two years, I have immersed myself in the Local Plan, regularly attending meetings of the Guildford Residents Association (GRA), the Guildford Society (GSoc), the Campaign
to Protect Rural England (CPRE), Guildford Borough Council and various parish councils and residents groups. I am a member of the GRA, GSoC and CPRE (Guildford branch), and up until May 2016, I was Chairman of Compton Parish Council.

I have prepared detailed responses to the Issues and Options Consultation and the Regulation 18 Local Plan consultations, which I hope will show the depth of knowledge that will allow me a place at the Examination.

The Save Hogs Back campaign is supported by three Local Parish Councils and numerous special interest groups and residents groups on the west of Guildford. It has helped to raise funds to draw on the knowledge of a planning expert to inform our contributions.

Attached documents:

Comment ID: SQLP16/545  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

Depending on who is already booked to speak, yes, I would like to be heard

Attached documents:

Comment ID: SQLP16/165  Respondent: 8746465 / Matthew Tipper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

It appears to me that the draft plan is little changed in scope from the previous version of 2014. I believe local people should be consulted and heeded; but it seems instead our views are needed as a box ticking exercise in this process, and then ignored.

Attached documents:

Comment ID: SQLP16/471  Respondent: 8749121 / George Paton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

1. Why has the demographic model commissioned using public money from Justin Gardner Consulting for the SHMA not been FULLY disclosed to the public. Without it the manner in which the OAN has been arrived at is opaque. The SHMA model is a black box and the calculations are incapable of replication by third parties. It therefore fails to meet the most basic test of objectivity.

2. Why has the sustainability of the strategic development sites in the local plan not been publicly examined, scrutinised, challenged and tested? Why in particular has a site in the middle of the parish of Ockham - the second least sustainable parish in the borough according to the settlement hierarchy - been selected for the site of a new town which will be the third largest settlement in the borough?
3. Why have the exceptional circumstances justifying the moving of Green Belt boundaries - in particular in Ockham - not been properly set out and justified in the local plan?

4. Why has my garden hedge been chosen as the new Green Belt boundary in Ockham? How is it a defensible Green Belt boundary? How does it satisfy the requirement to be permanent and defensible?

Attached documents:

Comment ID: SQLP16/1022  Respondent: 8752097 / Lucy Meade-King  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

This consultation process is not the first and residents in Guildford have been subject to a number of previous consultations in recent years. I do not believe that previous objections made about these matters have changed nor have they become irrelevant. I fear that on this occasion an element of consultation fatigue will have set in and/or people will feel that their previous objections will be taken into account. I therefore urge you to remember the petition signed by over 700 local residents objecting to changes to the settlement boundary and changes to the Green Belt that was sent to you in 2014.

Attached documents:

Comment ID: SQLP16/73  Respondent: 8766945 / Liz Machtynger  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

Horsley's, Clandon, Send, Garlicks Arch, Wisley I feel all of these require close examination.

Attached documents:

Comment ID: SQLP16/1805  Respondent: 8768609 / Sue Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

A longer period of consultation needed to asses the future needs in view of the altered political scene when there are already doubts of the numbers of houses allegedly needed.

Attached documents:

Comment ID: SQLP16/1182  Respondent: 8774113 / Ian Elliott  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
Guildford BC need to listen to what people want and react accordingly. We all know what happened when the Government didn’t listen regarding Europe.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/215</th>
<th>Respondent: 8775137 / Annette Clark</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> ()</td>
<td></td>
</tr>
<tr>
<td>5) I object to the very limited consultation period specifically as I and my family are extremely busy working and managing family issues. there is very little time to spend researching this current proposal.</td>
<td><strong>Attached documents:</strong></td>
<td></td>
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<table>
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<tr>
<th>Comment ID: SQLP16/241</th>
<th>Respondent: 8775169 / Shaun Cheyne</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> ()</td>
<td></td>
</tr>
</tbody>
</table>
| I object to the limited consultation period  
I object to the late inclusion of new sites (eg. Garlick’s Arch)  
Since 2014, GBC have changed major sites in Send proposed for development, and now a significant new road junction has been added. The 2014 proposal for 430 new houses went down in April 2016, then recently up again to 485. These significant changes require consultation under Regulation 18, which to date I’m not aware of having happened. | **Attached documents:** |

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1027</th>
<th>Respondent: 8788129 / Claire Attard</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> ()</td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td><strong>Attached documents:</strong></td>
<td></td>
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<tr>
<th>Comment ID: SQLP16/619</th>
<th>Respondent: 8792001 / Graham Moore</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> ()</td>
<td></td>
</tr>
</tbody>
</table>
In view of the uncertainties caused by "Brexit" in relation to the state of the Economy and the effect on population growth, the long term plan should be replaced by a shorter term plan.

Attached documents:

**Comment ID: SQLP16/101  Respondent: 8793025 / Janet Manktelow  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination**

**Answer: ()**

**OBJECTION**

Whilst I accept that every village has to grow and evolve, the proposals for Send Village are enormous and far reaching. Until about 10 days before the proposed Local Plan was launched the proposals for Send Village were comparatively low and with a few exceptions could possibly have been supported. However, as stated, 10 days before the approval a site was withdrawn and another, Garlick’s Arch (Policy 43a) was substituted. This adjusted the number of proposed houses from 185 to 485. This is almost a 25% increase over the current number of houses in the village. This vast change cannot be tolerated or justified.

Attached documents:

**Comment ID: SQLP16/2049  Respondent: 8794529 / Paul Tubman  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination**

**Answer: ()**

I object to the lack of due process that Guildford Borough Council have followed in reaching the decision to add the development of Garlick's Arch at the last minute, prior to including in the latest draft Local Plan. Since 2014 every proposed major development in Send and Send Marsh has been changed, with the original proposal for an additional 430 houses in 2014 being reduced to 185 by April 2016, and suddenly being increased to 485 in May 2016. Such large changes require full consultation under Regulation 19 of the planning process - this process has not been followed.

Attached documents:

**Comment ID: SQLP16/683  Respondent: 8796321 / Nick Etches  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination**

**Answer: ()**

7. I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

Attached documents:

**Comment ID: SQLP16/684  Respondent: 8796321 / Nick Etches  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination**
11. I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

Attached documents:

Comment ID: SQLP16/373  Respondent: 8800705 / Michael Cumper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Overall I object to the way that this plan has been put together in as much as there has been a failure to identify brownfield sites for development, the Town Centre Masterplan 2015 has not been included, there has been no proper consideration of the infrastructure requirements, such as new schools, GP services as examples, and what has been proposed is inadequate. I also object that there were sites added to the plan at the last minute.

Attached documents:

Comment ID: SQLP16/1042  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I propose that Policies A25, A43 and A43a should be deleted and that the sites covered therein should remain in the Green Belt. I wish to participate at the Examination to adduce evidence as to the impact of Policies A25, A43 and A43a on the transport infrastructure, to question witnesses for the Council and to make submission both on the facts and the law.

Attached documents:

Comment ID: SQLP16/464  Respondent: 8806849 / Roland McKinney  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

I would like to participate so that I can explain why I believe the quality of the Green Belt and Countryside study is such that it should not be admitted to the evidence base, and that the policy of insetting villages should not be based on this study. As it also recommends new green belt boundaries I would like to have the opportunity to show why large sections of the boundary proposed by Pegasus, the authors of this report, do not meet the requirements for new green belt boundaries as laid down in the NPPF with specific reference to the proposed green belt boundary around Effingham. Much of this boundary was recommended by Pegasus in their report.

It would also give me an opportunity to comment on other reports in the evidence base that I consider to be poor quality, to show why house prices in the borough is not driven just by the balance between supply and demand, and that in fact, house prices in Guildford are not less affordable than many of the surrounding boroughs and to comment on the proposals for affordable housing.
I would also like to express my concern to the inspector that the approach to risk in the local plan is complacent - there has been no risk assessment regarding housing policies (what happens if there is a housing bust?) or what happens if infrastructure such as the planned railway stations, or sewerage treatment, water supplies etc are not actually completed in line with housing policies? It seems that numerous complacent assumptions about the delivery of infrastructure have been made and that the risk of non-delivery has not adequately been considered. The lack of an effective monitoring policy for infrastructure delivery is also a source of risk.

Attached documents:

Comment ID: SQLP16/704  Respondent: 8808321 / Ian Peacock  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()

1. I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

Attached documents:

Comment ID: SQLP16/891  Respondent: 8810113 / Louise Stewart  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()

I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage.

Attached documents:

Comment ID: SQLP16/347  Respondent: 8817185 / Irene Cope  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()

NO THANK YOU

Attached documents:

Comment ID: SQLP16/742  Respondent: 8817537 / Kim Meredith  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()
I object most vehemently to the Guildford Borough Proposed Submission Local Plan (June 2016).

I list below the reasons why.

I object to GBC not following the correct process when amending the Local Plan. I believe another full consultation under Regulation 18 is required as changes have been significant. Some sites have been added at the very last minute without proper consultation.

Attached documents:

I object to the last minute inclusion of the Garlick’s Arch (A43) and it has not been consulted on previously.

Attached documents:

I am writing to object to the latest draft local plan, in particular with regards to the proposals for the village of West Horsley and the nearby villages including Send and Ripley. It is disappointing to note that previous overwhelming feedback about the retention of Green Belt land appears to have been largely ignored. Guildford Borough Council should listen to the people it represents and stand up for their concerns in the face of pressure from central government. The draft proposed numbers and locations would change for ever the character of rural villages with detrimental effect for all who live, work and travel in the Borough of Guildford.

Attached documents:

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

- Over 20,000 responses objected to the 2014 draft Plan and therefore I Object that this Plan is not materially different and the Consultation Process has not been properly followed for this Plan.

Attached documents:

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

- Over 20,000 responses objected to the 2014 draft Plan and therefore I Object that this Plan is not materially different and the Consultation Process has not been properly followed for this Plan.
• I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

Attached documents:

Comment ID: SQLP16/2109  Respondent: 8826529 / Martin Barker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I am most dissatisfied that only 6 weeks have been given for the public to read, consider and reply to the latest version of the Local Plan. In contrast Guildford Borough Council have taken from September 2014 until June 2016, approximately 21 months, to consider the responses to the last Plan and formulate the new Plan. Not only that, but the 6 weeks we have been given comes during the summer when there is so much else going on.

I for one do not have the time to plough through all the documentation again. The best I can do is to repeat the comments I made last time – as most of them are still relevant, although of course all the paragraph numbers have changed.

Therefore I set out below a copy of my comments made last time in my submission dated 16/09/2014.

I do however wish to make one further objection and that is in relation to Site Allocation A46. To locate 1100 homes plus a secondary school plus a care home and 1200 sq m of office and retail facilities would generate a very large number of additional road users. The roads in the area, particularly those in the direction of Guildford, are unable to sustain anything like such an increase. Furthermore this is Green Belt land which should only be built on in exceptional circumstances – which have not been demonstrated.

Attached documents:

Comment ID: SQLP16/858  Respondent: 8827489 / Karen Bradshaw  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Firstly I want to register my disappointment that Guildford Borough Council has taken so little notice of the comments made by the public in the initial consultation on the local plan. There is little point asking for comments if they are then to be ignored.

Attached documents:

Comment ID: SQLP16/1021  Respondent: 8828385 / Thomas Meredith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to all proposed sites in Send as they were not included in the previous consultation in 2014. Send residents have not been consulted on any of the new changes and all previous proposals have been considerably altered.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/102</th>
<th>Respondent: 8830689 / Beechcroft Drive Residents Association (Martin Robinson Dowland)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td>I object to the Council presenting this local plan without making amendments as proposed at the May Council meeting and subsequently.</td>
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<tr>
<td>it must be pointed out that the majority of comments concerning the last draft were objections to over development but the Council wrongly claims these were in a minority. More honesty is required as part of the democratic process.</td>
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<tr>
<td>The SHMA is obviously too high. Although the GGG objections were partially inaccurate, Councillor Spooner stated that he would support a revision of the SHMA with amendments yet rejected the opportunity to do so when given - the SHMA needs to be reassessed properly without bias in favour of those who are likely to gain: this is fully documented.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/1964</th>
<th>Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: (Yes)</td>
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<tr>
<td>SRG supports much of the draft Local Plan’s spatial vision and strategy and suggests amendments which seek to provide a more positive policy framework for the delivery of the desired comprehensive mixed use redevelopment of the station site (A7).</td>
<td></td>
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</tr>
<tr>
<td>SRG would welcome the opportunity to participate at the Examination, to contribute to the discussion of the Inspector’s questions arising from our representations and their implications and thereby assist to ensure the Plan is sound and compliant,</td>
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<tr>
<td>Please contact Steven Butterworth or Dennis Pope to discuss these representations</td>
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<td>Attached documents:</td>
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</tbody>
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<tr>
<th>Comment ID: SQLP16/1753</th>
<th>Respondent: 8836129 / Roger Shapley</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: (Yes)</td>
<td></td>
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<tr>
<td>We assert there is unproven demand for an 8FE secondary school within the western wards of Guildford and therefore, we wish to present the statistical evidence for that assertion at the Examination in Public.</td>
<td></td>
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<tr>
<td>We assert that Policy A49 is unsustainable in its current form and open to challenge. NPPF para 83 &amp; 84 require the council to define in the local plan documentation available for consultation the “exceptional circumstances” required under to change the Green Belt boundary; this is affirmed by the following legal judgements:</td>
<td></td>
<td></td>
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<tr>
<td>NPPF 83</td>
<td></td>
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<tr>
<td>• Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J</td>
<td></td>
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<td>• Carpets of Worth Limited v Wyre Forest District Council (1991)</td>
<td></td>
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<tr>
<td>• IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J</td>
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</table>
and therefore, we wish to present our arguments at the Examination in Public for this site to continue to be ‘washed over’ by the Green Belt, because if this land were ‘inset’, it would create an island of urban land with no connection to similar land.

We assert that the disregard of the contribution to the “openness” of the Green Belt made by the land parcels H10, H12, H13, H14, H15, H16, J16 and J17 identified as of particular sensitivity in the GBC re-evaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1, is in direct opposition to observations confirming the “openness” of land around the settlements of Normandy and Flexford made by planning inspectors during consideration of planning appeals in three cases as follows:

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision 14 July 2015

and therefore we wish to make our representations concerning these observations by PINS inspectors in opposition to GBC disregard of “openness” of these land parcels at the Examination in Public.

Attached documents:
### Comment ID: SQLP16/1797  **Respondent:** 8839041 / Jon Maslin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

**Attached documents:**

### Comment ID: SQLP16/408  **Respondent:** 8839521 / Lynn Yeo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I am writing to OBJECT to several procedural issues in the Local Plan 2016.

**I OBJECT to the lack of consultation of residents from Send for sites in the current draft of the Local Plan.**

Since 2014, GBC has changed every major site in Send. None of the sites in the current plan have been in previous versions of the plan so residents have not been consulted on them prior to their inclusion in this draft. Most egregiously, Sites A43 and A43a were only included at the last minute, less than two weeks before the draft was voted on and published. These sites are significant (Site A42 includes 400 homes, 7000sqm industrial space, new A3 on off ramp) and should require a full consultation under Regulation 18, not the short cut of Regulation 19. This procedural error should invalidate the addition of this site to the local plan.

**Attached documents:**

### Comment ID: SQLP16/428  **Respondent:** 8839745 / Ripley Parish Council (Suzie Powell-Cullingford)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

I have already separately submitted my response by letter to the proposed submission via email and also with a hard copy delivered by hand to GBC at Millmead.

I wish to express an absolute requirement in participating at the examination with the Inspectorate in due course as I have many and varied objections to this 2016 Local Plan with particular reference to policy A43 Garlick's Arch and policy A43a ramps at Burnt Common and the insetting from the Greenbelt of Send Marsh/Burnt Common. These objections are laid out in my letter.

The main basis of my objection being that the late substitution and inclusion of these sites A43 and A43a with no prior consultation and with little or no evidence base for inclusion, renders the 2016 Local Plan as unsound, unsustainable and unworkable.

**Attached documents:**

### Comment ID: SQLP16/1154  **Respondent:** 8840193 / David K Reynolds  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

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**Page 18 of 118**  
**Document page number**  1078
GBC must realise that Brexit has shown that the electorate are prepared to go against the wishes of both the politicians in power and the bureaucrats. Wo betide GBC Councillors and Council staff who received over 20,000 objections to the previous local plan yet allowed the new plan with little change to go out for consultation. We are all fed up with being told what is good for us and now require a radical change to your thinking re development in the Horsleys and Ockham to accord with the wishes of the electorate.

Attached documents:

Comment ID: SQLP16/445  Respondent: 8843361 / Adrian Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

But in an observational capacity I would like to be kept aware of the dates and venues please - I assume

Attached documents:

Comment ID: SQLP16/1571  Respondent: 8850817 / Sandra Woods  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Over 20,000 responses objected to the 2014 draft plan and therefore I object that this plan not materially different and the consultation process has not been properly followed for this plan.

Attached documents:

Comment ID: SQLP16/1572  Respondent: 8850817 / Sandra Woods  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is inappropriate at this stage

Attached documents:

Comment ID: SQLP16/1016  Respondent: 8850977 / Sam Pinder  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Finally, I would like to make a comment about the way in which this consultation has been handled. I do not believe that 6 weeks is sufficient time to allow people to properly read through all of the literature that GBC has provided and consider their views. It is a very short consultation for something that if successful, will have such a significant, far reaching and devastating impact. I also think that charging such huge amounts for paper copies of the Draft Local Plan is unfair on those many residents who do not have access to computer facilities and the internet. I think that GBC could have done better in producing succinct, pertinent information that allowed residents to easily understand and comment on
the potential impact of the Draft Local Plan on their area to make this a fairer process that allows everyone to give their views.

Attached documents:

---

Comment ID: SQLP16/1865  
**Respondent:** 8857185 / Tim Parker  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

There has also been a very limited period of consultation for this scale of development.

Attached documents:

---

Comment ID: SQLP16/1314  
**Respondent:** 8859553 / Clare Bevan  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

**Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)**

I OBJECT to the above referenced Local Plan on the following grounds:

1. 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.

Attached documents:

---

Comment ID: SQLP16/1990  
**Respondent:** 8889761 / A Dougherty  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I believe GBC has not carried out its requirement to follow Policy requirement of carrying out correct consultation process of Formulating a Local Plan and as such has failed in areas such as

1. Local Support
2. Community Awareness
3. Providing Information in a reasonable manner

Attached documents:

---

Comment ID: SQLP16/1252  
**Respondent:** 8895265 / Peter Wood  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()
I’m writing to share why I am strongly against the expansion of East Horsley, West Horsley and other villages in the surrounding area. I am very disappointed that the latest incarnation of the Local Plan appears largely unchanged despite the huge amount of feedback and objection you received during the last iteration.

Attached documents:

Comment ID: SQLP16/432  Respondent: 8898401 / Mary-Claire Travers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

I would like to explain to the inspector why the plan is unsound.

Attached documents:

Comment ID: SQLP16/710  Respondent: 8906177 / Peter & Robyn Cormack  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

- I object to the fact that new sites have been proposed in this consultation which have not previously been considered.

Attached documents:

Comment ID: SQLP16/1216  Respondent: 8907137 / Jennifer A. Milligan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the limited consultation period. It is very difficult for individuals to read through 1,800 pages.

Attached documents:

Comment ID: SQLP16/643  Respondent: 8913985 / Lynda Newland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I Object to the limited consultation period and last minute changes that appear to be driven by financial incentives from the government and developers offering bribes to enable them to build more houses. I refer in particular to the Garlicks Arch development proposed at Burntcommon offering new junctions on the A3 in return for 400 houses. There are no exceptional circumstances to remove this area from the green belt. The extra traffic through Send is not manageable on a road that is already often gridlocked during the rush hour.

Attached documents:
As an Ockham Parish Councillor I wish to participate in the Examination either personally or through a designated alternate.

Attached documents:

---

**Guildford Borough Council’s Proposed Submission Local Plan (published 6 June 2016)**

I OBJECT to the above referenced Local Plan on the following grounds:

1. 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.

Attached documents:

---

I am writing to express my strongest possible OBJECTION to the New Local Plan.

The previous Draft Local Plan issued in 2014 for consultation received more than 20,000 comments, the overwhelming majority of which expressed fundamental objections, yet the New Local Plan makes no changes of substance. The New Local Plan does not respond to the concerns of electors and the 20,000 comments will not be made available to the independent inspector. I consider that these issues amount to CONTEMPT of the electorate by Guildford Borough Council.

I am aware that the East Horsley Parish Council has made detailed objections to the New Local Plan in their letter of 13 June 2016 and specifically to the former Wisley airfield on 4 July 2016. The East Horsley Parish Council has articulated our concerns very clearly and I fully support their conclusions in their entirety. I trust the Guildford Borough Council will now give full weight to the concerns they have so professionally expressed.

Attached documents:

---

Although 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.
GBC should 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.

Attached documents:

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**Comment ID:** SQLP16/2041  **Respondent:** 8923777 / Andrew Mitchell  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** ()

I object to the very limited consultation period.

Attached documents:

---

**Comment ID:** SQLP16/247  **Respondent:** 8926657 / Lian Grieves  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** ()

4) I OBJECT to the limited consultation period.

6) I OBJECT to the late inclusion of new sites with less than 2 weeks notice.

Attached documents:

---

**Comment ID:** SQLP16/1877  **Respondent:** 8927905 / Jacqueline M Fish  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** ()

Firstly I want to register my disappointment that Guildford Borough Council has taken little notice of the comments made by the public in the initial consultation on the local plan. There is no point asking for comments if they are then to be ignored.

Attached documents:

---

**Comment ID:** SQLP16/394  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** (Yes)

As a local government organisation the PC would like the opportunity to represent their residents at any examination.

Attached documents:

---

**Comment ID:** SQLP16/246  **Respondent:** 8929921 / Caspar Hancock  **Agent:**
<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</th>
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<tr>
<td>Answer:</td>
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<tr>
<td>4) I OBJECT to the limited consultation period.</td>
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<tr>
<td>6) I OBJECT to the last minute inclusion of new sites with less than 2 weeks notice.</td>
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<td>Attached documents:</td>
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</tbody>
</table>

| Comment ID: SQLP16/1134  Respondent: 8933793 / Sally Novell  Agent: |
|--------------------------|---------------------------------------------|
| Document:                | Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |
| Answer:                  | ()                                                                                   |
| 11. I OBJECT to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. In particular, there has not been meaningful consultation on imposing a settlement boundary on East Clandon. |
| Attached documents:      |

| Comment ID: SQLP16/1135  Respondent: 8933793 / Sally Novell  Agent: |
|--------------------------|---------------------------------------------|
| Document:                | Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |
| Answer:                  | ()                                                                                   |
| 13. I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage; |
| Attached documents:      |

| Comment ID: SQLP16/1885  Respondent: 8944257 / Bruce Tindale  Agent: |
|--------------------------|---------------------------------------------|
| Document:                | Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |
| Answer:                  | ()                                                                                   |
| 1. I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered. |
| Attached documents:      |

| Comment ID: SQLP16/1886  Respondent: 8944257 / Bruce Tindale  Agent: |
|--------------------------|---------------------------------------------|
| Document:                | Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |
| Answer:                  | ()                                                                                   |
1. I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

Attched documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/313</th>
<th>Respondent: 8946721 / Fiona Middleton</th>
<th>Agent:</th>
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<tbody>
<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</table>

5. there has been insufficient time for this consultation period

Attched documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1929</th>
<th>Respondent: 8967233 / University of Surrey (University of Surrey)</th>
<th>Agent: Terence O'Rourke (Luke Vallins)</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</table>

In order to represent the University of Surrey as it is a major stakeholder in the borough.

Attched documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1949</th>
<th>Respondent: 8971137 / Woolf Bond Planning (Thomas Rumble)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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In accordance with the provisions at paragraphs 3.11 and 9.28 of the 'Procedural Practice in the Examination of local Plans' document (June 2016) (41h Edition), we request the opportunity to appear at the Examination in order for the soundness of the Plan to be determined, in particular having regard to its soundness in terms of the ability of Site A46 to deliver and contribute to meeting the housing requirement set out in Policy 82.

We trust the above comments are of assistance in producing a finalised version of the Local Plan prior to submission and await confirmation of receipt of our representations in due course.

Attched documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2007</th>
<th>Respondent: 8977025 / Sustainable Land PLC</th>
<th>Agent: Roger Daniels</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer: (Yes)</td>
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Yes
Sustainable Land PLC wishes to participate in the Examination to amplify its responses to this consultation; to provide further evidence on matters, issues and questions that will be identified by the Inspector; and to contribute to discussions with the Inspector and other participants on the basis of its knowledge and experience of the issues.

**Attached documents:** [Covering Letter_Sustainable Land.docx](#) (32 KB)

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/200</th>
<th>Respondent: 9040673 / Anne Pearse</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer: ()</td>
<td>I object to A44.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/2052</th>
<th>Respondent: 9078881 / Jean Trickett</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer: ()</td>
<td>LIMITED CONSULTATION PERIOD</td>
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<td>Far too short, and therefore undemocratic.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/2046</th>
<th>Respondent: 9332545 / John Chalmers</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer: ()</td>
<td>All in all, I feel let down by the proposed submission and hopefully major alterations will be made prior to it being presented for inspection particularly with the uncertainty that Brexit now brings.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/422</th>
<th>Respondent: 10563777 / Hazel Creasey</th>
<th>Agent:</th>
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<tbody>
<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer: ()</td>
<td>I object to the way in which Guildford Borough Council keep changing the proposed plan. In 2014 430 new houses were proposed in Send, which then was reduced to 185 and now it is up to 485 with a massive new road junction. These changes require a full consultation under Regulation 18.</td>
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<td>Attached documents:</td>
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<tr>
<td>Comment ID: SQLP16/1157</td>
<td>Respondent: 10616321 / Petrina Jeffreson</td>
<td>Agent:</td>
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<td>I object to the limited consultation period</td>
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<td>I object to last minute inclusion of new sites with less than 2 weeks notice</td>
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<tr>
<th>Comment ID: SQLP16/1359</th>
<th>Respondent: 10620801 / E. H. and J. A. Strange</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<td></td>
<td>I object to the limited consultation period, the last minute inclusion of new sites with less than 2 weeks notice.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/301</th>
<th>Respondent: 10646753 / Jenny Mackenzie</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: SQLP16/789</th>
<th>Respondent: 10717985 / Alison Drennan</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<td>• I object that all the proposed latest sites in Send were not included in the 2014 previous consultation. This proposal has not followed correct process or allowed for legitimate consultation.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/693</th>
<th>Respondent: 10721089 / Y Beraud</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td></td>
<td>I object to the recent proposed plan of the Guildford Borough Council. Since 2014 the G.B.C have changed every Major site in the proposed development for Send, and now have added a massive New Road Junction (which will add to the congestion that is already being experienced on the A3 and local roads, cyclists and pedestrians will suffer, environmental health will suffer through increased air pollution as well increased noise and light pollution).</td>
<td></td>
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</tbody>
</table>
In the proposed plan of 2014 there was provision for 430 houses, this was reduced to 185 in April of 2016, I now note the number has increased to the proposed plan of 2014. These significant changes require another full consultation under regulation 18 and not the short cut of regulation 19 which the G.B.C are trying to get away with.

THIS INVALIDATES THE WHOLE PROCESS.

Attached documents:

---

**Comment ID:** SQLP16/1158  **Respondent:** 10721537 / Stephen Niblett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to all the proposed sites in Send put forward by the council because they were not included in the previous consultation in 2014. Also unlike the rest of the borough, Send residents have not been properly consulted and all its sites have been changed substantially.

Attached documents:

---

**Comment ID:** SQLP16/1255  **Respondent:** 10721601 / Vivienne Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

Attached documents: Document.pdf (248 KB)

---

**Comment ID:** SQLP16/1851  **Respondent:** 10723553 / Judith Pound  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice – similarly this does not allow sufficient time for consideration.

Attached documents:

---

**Comment ID:** SQLP16/1065  **Respondent:** 10724769 / P. Broughton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()
I object to all the proposed sites in Send and Send Marsh because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send and Send Marsh have not been properly consulted and all its sites have been changed substantially

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1215</th>
<th>Respondent: 10725345 / T. Sharman</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td>I object to the disregard of GBC and its attitude towards planning regulations and lack of consultation with relative bodies including parish councils in Send and Ripley of which they have shown no respect.</td>
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<td>Attached documents:</td>
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<th>Comment ID: SQLP16/382</th>
<th>Respondent: 10726561 / L. Boyle</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td>GBC have not followed correct process. Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which I believe GBC are trying to do. This invalidates the whole process.</td>
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<tr>
<th>Comment ID: SQLP16/203</th>
<th>Respondent: 10727009 / A. Elms</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td>Please ensure my objections are made known to the Planning Inspector. I object to the inclusion of major changes to the developments in Send which should receive full consultation instead of six weeks under Regulation 18.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/204</th>
<th>Respondent: 10729473 / P.T. Elms</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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</table>
I object to the failure of GBC to follow the correct process. Since 2014 GBC has changed every major site in Send proposed for development and has now just added a massive new road junction. These significant changes require another full consultation under Regulation 18.

I object to GBC trying to use Regulation 19 and, therefore, the invalidation of this whole process.

Attached documents:

---

Comment ID: SQLP16/638  Respondent: 10731233 / Linda Aris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT to the limited consultation period.

Attached documents:

---

Comment ID: SQLP16/1550  Respondent: 10731937 / Carol Mullan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

---

Comment ID: SQLP16/1530  Respondent: 10731969 / Tony Mason  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

---

Comment ID: SQLP16/1316  Respondent: 10732097 / Gillian Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

1. I object to all the proposed development sites in Send because they were not included in the previous consultation in 2014. Send has not been properly consulted.

Attached documents:
4. I object to all the proposed developments in Send as they are significant changes from 2014 and full consultation under Regulation 18 has not been made.

Attached documents:

I OBJECT to GBC not having followed correct process in relation to the above Policies being objected to (P2, A42, A43, A43a, A44) The significant changes to GBC Local Plan in relation to Send from 2014 until now July 2016 mean that a full consultation must be undertaken under regulation 18, and not the short-cut Regulation 19 process currently being attempted by GBC

Attached documents:

I would like to add my voice to the increasing number of those people who, like myself, are raising concerns regarding the thinking and direction outlined in the recent publication.

I object to this plan, as it is clear that it is not materially different to the 2014 draft plan to which over 20,000 responders objected, including myself. It is clear that the consultation process has not been followed in any meaningful way as residents previous concerns have not been addressed

Attached documents:

I object to the fact that new sites have been proposed in this consultation that have not been previously considered.

Attached documents:

I object to all the proposed developments in Send as they are significant changes from 2014 and full consultation under Regulation 18 has not been made.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/236</th>
<th>Respondent: 10756961 / Carol Marsh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> ()</td>
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<tr>
<td>I object to the limited consultation period</td>
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<tr>
<th>Comment ID: SQLP16/282</th>
<th>Respondent: 10773409 / Anne Monk</th>
<th>Agent:</th>
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<tbody>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> ()</td>
<td></td>
</tr>
<tr>
<td>Finally I object to the process GBC have taken to try and implement their ideas. The changes made to cut the houses from 185 to 485 have not had another full consultation, which invalidates the process.</td>
<td></td>
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<tr>
<td>Having stated these points, I believe that it is vitally important that the local plan does not take place, and is re-thought out.</td>
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<tr>
<td>Thank-you for taking the time to read this, and I would like this to be passed on to the Inspector.</td>
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</tbody>
</table>

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/242</th>
<th>Respondent: 10774881 / Kate Cheyne</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>I object to the limited consultation period</td>
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<tr>
<td>I object to the late inclusion of new sites (eg. Garlick’s Arch)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Since 2014, GBC have changed major sites in Send proposed for development, and now a significant new road junction has been added. The 2014 proposal for 430 new houses went down in April 2016, then recently up again to 485. These significant changes require consultation under Regulation 18, which to date I’m not aware of having happened.</td>
<td></td>
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</tbody>
</table>

**Attached documents:**
My specific objections are as follows:

- I object to fact that over 20,000 responses were registered to the 2014 Draft Plan and yet this plan is not materially different, meaning that the Consultation Process has not been properly followed.

I object to the fact that new sites have been proposed in this consultation which have not been considered before and is not appropriate at this stage.

Attached documents:

---

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Attached documents:

---

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Attached documents:

---

We assert there is unproven demand for an 8FE secondary school within the western wards of Guildford and therefore, we wish to present the statistical evidence for that assertion at the Examination in Public.

We assert that Policy A49 is unsustainable in its current form and open to challenge. NPPF para 83 & 84 require the council to define in the local plan documentation available for consultation the “exceptional circumstances” required under to change the Green Belt boundary; this is affirmed by the following legal judgements:

NPPF 83
• Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
• Carpets of Worth Limited v Wyre Forest District Council (1991)
• IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J
• Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J

and therefore, we wish to present our arguments at the Examination in Public for this site to continue to be ‘washed over’ by the Green Belt, because if this land were ‘inset’, it would create an island of urban land with no connection to similar land.

1. We assert that the disregard of the contribution to the “openness” of the Green Belt made by the land parcels H10, H12, H13, H14, H15, H16, J16 and J17 identified as of particular sensitivity in the GBC re-evaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1, is in direct opposition to observations confirming the “openness” of land around the settlements of Normandy and Flexford made by planning inspectors during consideration of planning appeals in three cases as follows:

• Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 APP/Y3615/A/10/2131590 Decision 24 Feb 2011
• Green Lane East GBC 10/P/00507, Application 8 March 2010 APP/Y3615/A/10/2140630 Decision 14 June 2011
• North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision 14 July 2015

and therefore we wish to make our representations concerning these observations by PINS inspectors in opposition to GBC disregard of “openness” of these land parcels at the Examination in Public.

Attached documents:

Comment ID: SQLP16/856  Respondent: 10800673 / Nigel Rowland  Agent: 10800673 / Nigel Rowland
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT TO THE FACT THAT GBC HAVE NOT FOLLOWED THE CORRECT PROCESS

• I OBJECT to GBC adding Garlick’s Arch to the plan at only 13 days before the 24th May discussion of the Local Plan by GBC. The fact that this was ‘last minute’ was admitted by Mr Spooner at the Send Parish Council Meeting on June 14th. This site presents a significant change to the regulation 18 consultation in 2014, and therefore should have been fully debated, rather than accepted through a shortcut of Regulation 19. The fact that GBC have been ‘gifted’ the land to build the slip road to the A3 (policy A43a) in return for the inclusion Garlick’s Arch leads to cynicism and doubt that due process is being followed.
• I OBJECT to the disregard that GBC have shown to the concerns of local residents through previous ‘consultation’ processes which suggests that this one will be no different. Since 2014 GBC have changed every major site in Send proposed for development and now want to add a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up to 485. This is in spite of a huge amount of effort by local residents to give the requested feedback to the previous plan. Naturally people are tired of repeating the same objections on seemingly deaf ears, but GBC should not conclude that the proposals have public support.

Overall, I OBJECT to the Local Plan. I would like these comments to be seen and considered by a planning inspector.
I urge you to reconsider and to listen to the voices of those of us who have lived here for many years and understand the full implications of what is being suggested. The residents of Send do not deserve to be treated in such a cavalier and irresponsible way by GBC.

Attached documents:

---

**Comment ID:** SQLP16/637  **Respondent:** 10803009 / M Robson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object because GBC has not followed due process under regulation 18 requiring full consultation to the further proposed changes to numbers of houses to be built. Regulation 19 is not sufficient in this instance.

Attached documents:

---

**Comment ID:** SQLP16/237  **Respondent:** 10804993 / Alex Laing  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

- I object to the limited consultation period
- I object to the last minute inclusion, into the plan, of new housing development sites with less than two weeks notice
- I object to the inclusion of 2000 homes on the Wisley airfield site when the previous proposal to develop this has already been rejected by GBC as unsuitable

Attached documents:

---

**Comment ID:** SQLP16/1047  **Respondent:** 10808833 / David Brandon  **Agent:** Vail Williams (Suzanne Holloway)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

The site is suitable, available, and deliverable.

Given the opportunity to 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.

Attached documents:

---

**Comment ID:** SQLP16/409  **Respondent:** 10820961 / D Davies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()
I object to the draft local plan

I object to the Guildford Borough Council not following the correct procedure for plans put forward at the last minute. It is deceitful and underhand.

Attached documents:

Comment ID: SQLP16/721  Respondent: 10829281 / Kevin Nicholls  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the limited consultation.

Attached documents:

Comment ID: SQLP16/139  Respondent: 10831201 / Norma Plank  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

4) I object to the limited consultation period and question the reasons for this.

5) I object to the last minute inclusion of new sites with less than 2 weeks notice. WHAT IS GOING ON?

10) I object to the Council turning down major developments for many valid reasons and then immediately reinstating those same developments in the draft plan with all those issues unresolved.

Please take my objections seriously. Once the green open spaces are gone they are gone forever. How can this irresponsible, narrow minded action be allowed to succeed?

Attached documents:

Comment ID: SQLP16/1601  Respondent: 10831681 / James Cope  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/1815  Respondent: 10833025 / M Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
GBC have not followed correct procedure. Since 2014 GBC has changed every major site in Send proposed for development and now has added a new massive road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under regulation 18, not the short cut regulation 19 which GBC are trying to get away with. This invalidates the whole process.

Attached documents:
Your original plan of 2014 proposed 430 houses for Send, but this went down in April 2016 to 185 after many objections. This has now gone back up to 485. You cannot make these significant changes without another full consultation under Regulation 18. This will invalidate the whole process!

Attached documents:

Comment ID: SQLP16/688   Respondent: 10840769 / Rosemarie Haxton   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

2) I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/1875   Respondent: 10844993 / Simon Wright   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

General points of objection:

GBC have not followed correct procedure. Since 2014 GBC has changed every major site in Send proposed for development and now has added a new massive road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under regulation 18, not the short cut regulation 19 which GBC are trying to get away with. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/1808   Respondent: 10845537 / Chloe Moore   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

4) limited consultation period
5) last minute inclusion of new sites with less than 2 weeks to go

Attached documents:

Comment ID: SQLP16/1361   Respondent: 10845569 / Stu Edwards   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/183</th>
<th>Respondent: 10849377 / Vickie Leonard</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
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<td>Answer: ()</td>
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</tbody>
</table>

I object to the limited consultation period, you are not listening to the people that have to live and breathe it daily, our voice does not count.

I object to the last minute inclusion of new sites with less than 2 weeks’ notice, so someone could go on holiday and come back to find this!

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/96</th>
<th>Respondent: 10852161 / Andrea McGeachin</th>
<th>Agent:</th>
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</thead>
<tbody>
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3. The consultation period is very limited and creates a fear to myself as a resident that this is not being consulted properly. This also includes the last minute additions that are less than 2 weeks notice.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/738</th>
<th>Respondent: 10852801 / Carolyn Hart</th>
<th>Agent:</th>
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I object to all the proposed sites in Send because they were not included in the previous consultation in 2014.

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/1308</th>
<th>Respondent: 10853249 / Evan Parry-Morris</th>
<th>Agent:</th>
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Limited consultation period.
I object to the limited consultation period for the Guildford Local Plan. The range and extent of the proposals would have benefitted from a longer period of consideration.

Late inclusion of new sites in the Local Plan

I object to the late inclusion of parts of the Local Plan with less than two-weeks notice. This particularly relates to the Garlick’s Arch and the four-way on/off ramp to the A3 at Burnt Common.

Attached documents:

---

Comment ID: SQLP16/106  Respondent: 10853857 / Norman Kidd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

1. GBC HAVE NOT FOLLOWED CORRECT PROCESS.

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process and I strongly object to GBC officials completing ignoring the views of the local population who elect them.

Attached documents:

---

Comment ID: SQLP16/240  Respondent: 10855777 / Ian Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

It’s a ridiculous over egged proposal.

- I object to the last under hand inclusion of the new sites with less than a few weeks’ notice

Attached documents:

---

Comment ID: SQLP16/151  Respondent: 10856513 / Janet Kidd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I have strong objections to the latest version of the local plan as recently published and in particular as it affects Send and our local environment.

It seem to me that many of the objections raised a year or so ago, which on the surface seemed to have been taken into account of, have now been completely disregarded in the latest version and several new projects introduced, all of which have an adverse effect on the village. In particular the concept of taking Send completely out of the Green Belt classification.
In my view, we do not need as many houses as the government think, what we need is less people but that is a matter for
the national government to resolve with the electorate at large

I would ask that this letter of objection and my comments below be seen by the Inspector.

1. **GBC HAVE NOT FOLLOWED CORRECT PROCESS.**

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road
junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These
significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC
are trying to get away with. This invalidates the whole process and I object strongly to GBC officials completing ignoring
the views of the local population who elect them.

**Attached documents:**

---

**Comment ID:** SQLP16/1231  **Respondent:** 10857889 / William Kyte OBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

The views of residents have been largely ignored and need to be addressed at the Examination. Responses to previous
consultations need to be taken into account as respondents are now suffering from consultation fatigue.

**Attached documents:**

---

**Comment ID:** SQLP16/251  **Respondent:** 10858657 / Fiona Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

- I object to the last minute inclusions of new sites
  - Garlick Arch (Policy A43 – 400 houses and industrial units)
  - North and south bound junctions for the A3 to the A247 Clandon
  - Gosden Hill, Merrow of 2000 houses

**Attached documents:**

---

**Comment ID:** SQLP16/687  **Respondent:** 10859265 / Neil Haxton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

2) I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any
significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required
another full consultation, which did not happen. This invalidates the whole process.

**Attached documents:**
Comment ID: SQLP16/1772  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

Question 5: Examination

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

Attached documents:

Comment ID: SQLP16/1085  Respondent: 10860993 / Peter and Fiona Armitage  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

You received a substantial level of objections to your previous proposed plan in 2014 and yet this relaunch is fundamentally broadly similar to your previous plan suggesting that little has been learnt from the previous exercise or that GBC is not really listening to the expressed views and wishes of its rates paying residents.

Attached documents:

Comment ID: SQLP16/837  Respondent: 10865889 / Dreda M Todd DBO  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

1. **I OBJECT that GBC have not followed the correct procedure.**

Since 2014 GBC has changed every major site in Send proposed for development. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/290  Respondent: 10866305 / Christine Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

8) I Object to the limited consultation period

9) I Object to the last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

Comment ID: SQLP16/754  Respondent: 10866945 / Kristine Good  Agent:
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially from the original plans published.

Attached documents:
I wish to raise numerous objections to the proposed GBC local plan as follows (and I request that my comments be shown to the planning inspector):

I object to the last minute inclusion of new sites into the local plan with less than 2 weeks notice

Attached documents:

---

Comment ID: SQLP16/1401  Respondent: 10868609 / Robert Lockie  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()

- I object to the fact that GBC does not seem to have followed correct process in its dealings over the local plan. Since 2014 GBC has changed ever major site in Send proposed for development. In 2014 the proposal was for 430 houses and went down to 185 in April 2016; now it has gone up again to 485: this would need another full consultation under Regulation 18 and not the short cut of Regulation 19 which is what GBC is trying to do. It stabs at total incompetence and this and other anomalies makes me wonder exactly what GBC secret agenda is!
- I object to the fact that GBC has not bothered to challenge central government about the proposed need for housing etc that it has put forward for our area. Local authorities are allowed to apply ‘constraints’ to the number because of factors like Green Belt and infrastructure issues
- I object to the limited consultation period, especially as it has occurred in the summer months when people are away on holiday

Attached documents:

---

Comment ID: SQLP16/672  Respondent: 10869857 / A.C. Smith  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()

Objections to Draft Local Plan

I wish to object to a number of the policies set out in the Draft Local Plan, as follows:

1. Generally, I object to the process being followed. Since the 2014 consultation, Guildford Borough Council have altered every major site in the Send area proposed for future development, and in particular have included in the latest Draft Plan sites for development which have never been mentioned before, particularly Policies A43, A43a and A44. These changes are of such significance that a full consultation under Regulation 18 is required.

Attached documents:

---

Comment ID: SQLP16/107  Respondent: 10870049 / Paul Bartlett  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()

As a local resident I object to the 2016 Draft Local Plan for a number of reasons:
• I object to the manner in which this has been introduced verges on being undemocratic with a short consultation period with only six weeks notice given.
• I further object to the inclusion of new sites with less than two weeks notice.
• There has been little or no consultation with local residents to which I object.

Attached documents:

Comment ID: SQLP16/1570  Respondent: 10877249 / Ann Hamilton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (No)

The failure of Guildford Borough Council (GBC) to follow due and correct process. Since 2014, GBC has changed the plans for every major site in Send proposed for development and now seeks to add a massive new road junction. The 2014 proposal for 430 houses reduced to 185 in April 2016 and now shoots up to 485. These significant changes require full consultation under Regulation 18, not the Regulation 10 short cut which GBC seek to get away with. This action appears to invalidate the whole process.

Attached documents:

Comment ID: SQLP16/112  Respondent: 10878273 / Charlene Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than 2 weeks notice.

Attached documents:

Comment ID: SQLP16/1026  Respondent: 10878433 / John Townsend  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

Comment ID: SQLP16/1566  Respondent: 10881217 / Ben Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I wish to object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

Comment ID: SQLP16/942  Respondent: 10892353 / Robert Wilson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (No)
N/A
Attached documents:

Comment ID: SQLP16/1569  Respondent: 10895009 / Holly Broughton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

- I object to all the proposed sites in Send and Send Marsh because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send and Send Marsh have not been properly consulted and all its sites have been changed substantially

Attached documents:

Comment ID: SQLP16/1061  Respondent: 10895137 / Katrina Broughton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to all the proposed sites in Send and Send Marsh because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send and Send Marsh have not been properly consulted and all its sites have been changed substantially

Attached documents:

Comment ID: SQLP16/125  Respondent: 10901121 / Bernie Hales  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

1. I object to the limited consultation period
2. I object to the last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

Comment ID: SQLP16/1508  Respondent: 10910625 / Alyson Blackwell  Agent:
I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1509</th>
<th>Respondent: 10910625 / Alyson Blackwell</th>
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<th>Comment ID: SQLP16/1510</th>
<th>Respondent: 10910625 / Alyson Blackwell</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td>I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.</td>
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<tr>
<th>Comment ID: SQLP16/740</th>
<th>Respondent: 10913377 / Isabelle Stevens</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<td>I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.</td>
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<th>Comment ID: SQLP16/1300</th>
<th>Respondent: 10915041 / Balazs Hegedus</th>
<th>Agent:</th>
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<tbody>
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<td>Answer: ()</td>
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<td>Section page number</td>
<td>Document page number</td>
</tr>
<tr>
<td>Page 47 of 118</td>
<td>1107</td>
</tr>
</tbody>
</table>
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.

Attached documents:
I object to the last minute inclusion of new sites with less than 2 weeks notice and with very limited consultation time giving residents very little time to object. One could almost go so far as to suggest that this last minute inclusion in particular the site at Garlicks Arch where hundreds of houses are suggested is underhanded. Why have these sites now suddenly been added, why were they not included in the last draft plan. How can the council seem to simply appear to keep changing their minds regarding sites. Is it on the basis that if you do it often enough people will get fed up having to lodge objections, get worn down by the whole process thus leaving the council a clear path to build!

Attached documents:

---

Comment ID: SQLP16/1837  Respondent: 10923745 / Marwan Khalek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

1. The proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially

Attached documents:

---

Comment ID: SQLP16/372  Respondent: 10924897 / Louis Botha  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

Please find below my objections to the revised draft Guildford Borough Local Plan currently open to consultation.

To start with, I object to the approach to consultation that the Council is taking. The Council withdrew the 2014 draft Local Plan following an outcry from residents. During its re-drafting, instead of arriving at a sensible alternative the Council has changed every major site in Send and added a massive new road junction. It beggars belief that the Council could on one hand state that they listened to residents, whilst on the other hand increase the planned housing levels in the village. Either way, the proposed changes are significant and therefore require another full consultation under Regulation 18, not the short-cut of Regulation 19 which the Council is using.

Attached documents:

---

Comment ID: SQLP16/145  Respondent: 10925025 / Theresa Roads  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

1. I object to the Council bringing this proposal in without any Community consultation and the lack of time given to object.

Attached documents:

---

Comment ID: SQLP16/205  Respondent: 10928097 / Tina Foulkes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()
I must say I was taken by surprise that the revised draft Local Plan for Lovelace with marginal changes to the former draft was pushed through, although just a few days earlier the GBC planners had unanimously shot down a centrepiece of it. To me as a citizen, it seems that the various GBC boards don’t talk to one another, or that some have a secret agenda for very personal reasons.

-how can it be that a local council decides to withdraw parts of their land out of a national protected area, the Green Belt just to ease its planning challenges? Politicians should look at the impact of their actions for future generations and not just shortsighted to the next election and how to make their job easier.

Attached documents:

---

**Comment ID:** SQLP16/726  **Respondent:** 10928769 / John Slatford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to the apparent last minute inclusion of new development sites, Obviously intended to create even more confusion and uncertainty.

Attached documents:

---

**Comment ID:** SQLP16/1159  **Respondent:** 10930561 / Robert and Gill Churchlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

It seems incredible that, after such an overwhelmingly negative response from residents to the previous Plan, that so few of the objections have been taken into account in this latest draft. What is the point of consultation if you are not going to listen?

Attached documents:

---

**Comment ID:** SQLP16/1823  **Respondent:** 10934689 / Adam Fox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

---

**Comment ID:** SQLP16/1347  **Respondent:** 10943265 / Barbara Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()
I object to the last minute inclusion of new sites with less than two 2 weeks notice I object to the limited consultation period

Attached documents:

---

Comment ID: SQLP16/2053  Respondent: 10952193 / Chrissie Beard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

The amount of housing is estimated to give a population increase which is almost 70% higher than the official national estimates for population growth in the borough

The inflated number of proposed houses is based upon a consultants mathematical model which is not revealed in the plan

Attached documents:

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Comment ID: SQLP16/2090  Respondent: 10954849 / David Hayward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. In particular, there has not been meaningful consultation on imposing a settlement boundary on East Clandon.

I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

Attached documents:

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Comment ID: SQLP16/85  Respondent: 10957441 / Christopher Hunter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object

Attached documents:

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Comment ID: SQLP16/92  Respondent: 10957441 / Christopher Hunter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

I object to proposal A43 Garlick's Arch
I object to all the proposed sites in Send put forward by the council because they were not included in the previous consultation in 2014. Also unlike the rest of the borough, Send residents have not been properly consulted and all its sites have been changed substantially.

I really do object to all the proposed sites in Send as they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially. The semi rural nature of the village would be damaged irreparably.

There were over 20,000 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!

The consultation period is limited in time. I believe the Local Plan should be presented properly at public consultations and the feedback taken on board because I don’t see that it has been to date.

The examination

I object to all the proposed sites in Send put forward by the council because they were not included in the previous consultation in 2014. Also unlike the rest of the borough, Send residents have not been properly consulted and all its sites have been changed substantially.

I really do object to all the proposed sites in Send as they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially. The semi rural nature of the village would be damaged irreparably.

There were over 20,000 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!

The consultation period is limited in time. I believe the Local Plan should be presented properly at public consultations and the feedback taken on board because I don’t see that it has been to date.
These representations relate to the strategic delivery of employment within the draft Local Plan and as such it is necessary that sufficient debate takes places at the Examination.

**Comment ID:** SQLP16/562  **Respondent:** 10987137 / Susan Wong  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (No)

1. The consultation period is not very long. It being in the summer many people will be away and miss the opportunity to comment on the plan.

**Comment ID:** SQLP16/1488  **Respondent:** 10987745 / Ian Pigram  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (No)

I object to all the proposed site plans for Send because they are based on unsound legal process, i.e. they were not included in the previous consultation in 2014. Regulation 18 should have been used rather than Regulation 19.

**Comment ID:** SQLP16/143  **Respondent:** 10989793 / Ruth Pott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (No)

4) I object most strongly to the limited consultation period

5) I object most strongly to the last minute inclusion of new sites with less than two weeks notice

**Comment ID:** SQLP16/180  **Respondent:** 10990465 / Victoria Bean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (No)

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.
Comment ID: SQLP16/2030  Respondent: 10992801 / Martine Szabo-toth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/1253  Respondent: 10998721 / C E Noble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

2. I object to the six week consultation period which is totally and utterly inadequate for proposals of this nature and magnitude. It does not give parties affected adequate time to prepare their case and/or to take professional advice. Perhaps this is the intention.

3. I object to the 2 week notice of some of the included sites. Such a period, coupled with a ridiculously inadequate consultation period for such major planning proposals that would radically alter the character of the whole area is nothing short of ridiculous.

4. I object to the document itself, which is far from user friendly. It is excess of 1800 pages in length and gives every impression of being "cobbled together" as a matter of urgency without anything like the amount of consideration that such major proposals need. It gives every impression of having been prepared with the intention of confusing rather than informing affected parties.

Attached documents:

Comment ID: SQLP16/1260  Respondent: 10998721 / C E Noble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I object to the fact that the majority of these points were brought up in my previous objection the Local Plan sites 67/74/75/76 and 99/ Send/Sendmarsh. No satisfactory answers have been given to these points in your new plan, and it would appear that they have been conveniently "swept under the table" leaving large unanswered objections to the people in the areas concerned. If your Council is expecting support from the local residents in the area you need to produce a professional plan taking their concerns into consideration and giving satisfactory answers to their objections, so far this has not been done.

Attached documents:

Comment ID: SQLP16/782  Respondent: 11003361 / Howard Milner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
I object to the very limited consultation period
I object to the late inclusion of new sites.

Attached documents:

Comment ID: SQLP16/423  Respondent: 11003681 / Elizabeth Milner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the limited consultation period
I object to the last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

Comment ID: SQLP16/1064  Respondent: 11007713 / Grahame Crispin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT to Guildford Borough Council not having followed correct process in relation to the above Policies being objected to (namely P2, A42, A43, A43a, A44).

The significant changes to the GBC Local Plan in relation to Send from 2014 until now July 2016 mean that a full consultation must be undertaken under Regulation 18, and not the ‘short-cut’ Regulation 19 process currently being attempted by GBC

Attached documents:

Comment ID: SQLP16/666  Respondent: 11010273 / Dave Brownjohn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

• Lack of consultation time – a 6 week period for members of the public to be expected to read, understand and analyse a Plan of this size is totally unreasonable.

Please do not let this Plan be approved until all the factors are assessed and explained to the Guildford constituency

Attached documents:

Comment ID: SQLP16/1056  Respondent: 11011969 / Diana Gibson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. There is certainly no local need in Send to expand the village by over 25% which it would with the proposal to build an additional 485 houses in the village. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially from the previous draft local plan.

Attached documents:

Comment ID: SQLP16/2032  Respondent: 11023489 / Trevor Pound  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()

I OBJECT TO the last minute inclusion of new sites with less than two weeks notice.

The UK today is considered to be one of the world's leading democracy, and is, relatively speaking, a country of transparency and good faith. It is not good faith, however, to include elements of this local plan in this manner. I would kindly request that you familiarize yourselves with the British Constitution, and with the idea that democratically elected officials are elected on the basis of manifestos. Their election by the people is a mandate to carry out the policies within their manifesto, NOT to abuse this trust and attempt to sneak through policy "through the back door".

Attached documents:

Comment ID: SQLP16/552  Respondent: 11025281 / Alan Willmott  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: (No)

I am not qualified for this role

Attached documents:

Comment ID: SQLP16/375  Respondent: 11028481 / Emma Rowland  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination  
Answer: ()

I OBJECT TO THE FACT THAT GBC HAVE NOT FOLLOWED THE CORRECT PROCESS

- I OBJECT to GBC adding Garlick’s Arch to the plan at only 13 days before the 24th May discussion of the Local Plan by GBC. The fact that this was ‘last minute’ was admitted by Mr Spooner at the Send Parish Council Meeting on June 14th. This site presents a significant change to the regulation 18 consultation in 2014, and therefore should have been fully debated, rather than accepted through a shortcut of Regulation 19. The fact that GBC have been ‘gifted’ the land to build the slip road to the A3 (policy A43a) in return for the inclusion Garlick’s Arch leads to cynicism and doubt that due process is being followed.

- I OBJECT to the disregard that GBC have shown to the concerns of local residents through previous ‘consultation’ processes which suggests that this one will be no different. Since 2014 GBC have changed every major site in Send proposed for development and now want to add a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up to 485. This is in spite of a huge amount of effort by local residents to give the requested feedback to the previous plan. Naturally people are tired
of repeating the same objections on seemingly deaf ears, but GBC should not conclude that the proposals have public support.

- Overall, I OBJECT to the Local Plan. I would like these comments to be seen and considered by a planning inspector.

Attached documents:

**Comment ID:** SQLP16/1568  **Respondent:** 11032513 / Mary Candy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than two weeks’ notice.

Attached documents:

**Comment ID:** SQLP16/774  **Respondent:** 11032705 / Mike Tarrant  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object because GBC have not followed correct process. Since 2014 GBC has made changes on every major proposed development in Send and have now added a major road junction. Policy A43a.

The 2014 proposal for 430 house in Send was reduced to 185 in April 2016. In May 2016 policy A43 was added with 400 houses and Industrial units. These significant changes require full consultation under Regulation 18. Regulation 19, which GBC are using is not appropriate in this instance.

Attached documents:

**Comment ID:** SQLP16/1642  **Respondent:** 11036289 / Osman Abdullah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

Attached documents:

**Comment ID:** SQLP16/716  **Respondent:** 11036705 / Brian Slade  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()
GUILDFORD BOROUGH COUNCIL HAVE NOT FOLLOWED CORRECT PROCESS. Since 2014 GBC have changed every major site in Send proposed for development - added a major main road interchange junction and varied their housing requirements from 430 houses in 2014 to 185 in April 2016 now revised upwards in this Draft to 485. These significant changes require another full consultation under Regulation 18.

Attached documents:

Comment ID: SQLP16/285  Respondent: 11040449 / Rosalind Pollock  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

5/ I think there needs to be an extended consultation period to address the above critical issues.

Attached documents:

Comment ID: SQLP16/1783  Respondent: 11041569 / Peter Belton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Having reviewed the Local Plan I want to express my concerns over many aspects of the development included. I feel the Council has ignored objections residents made in the 2014 consultation, showing a complete lack of consideration for the impact such extensive development will have in the local area.

I object to the Council making substantial last minute changes to the plan, such as the Garlick’s Arch development in Send and the addition of a major alteration/enlargement of the junction on the A3 at Burnt Common. There are also many other significant changes to the 2014 plan. This requires a full consultation under Regulation 18, not the limited consultation under Regulation 19 for minor changes.

I think the brief six week Local Plan consultation, placed in summer when many people are away on holidays, is a deliberate act to limit residents’ opportunity to fully review the extensive documentation comprised in the Plan and to then make any appropriate objections if required.

I object to both these developments on the grounds that there was improper use of Regulation 18; no local consultation; that Garlick’s Arch is green belt land which includes an area of ancient woodland and parts of which are low lying and subject to flooding.

I object to the alteration to the A3 junction at Burnt Common, as it has not been part of a full infrastructure review and proper consultation with local residents. It was added to the plan at the last minute to avoid proper scrutiny.

Attached documents:

Comment ID: SQLP16/239  Respondent: 11048353 / Lynda Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I am objecting to the local plan in Surrey and in particular to West Horsley.
I am amazed that very little consideration has been given by the council to previous objections. Nothing seems to have altered.

Attached documents:

Comment ID: SQLP16/717  Respondent: 11069601 / Barry Kiddell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Finally, I am dismayed that I am being consulted again after I had already sent my views to the earlier draft plan. The money wasted on repeating this exercise is not acceptable. I suggest that it is funded by the Councillors responsible for the fiasco and not by the residents.

Attached documents:

Comment ID: SQLP16/2034  Respondent: 11071649 / Martin Southcott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I am shocked by GBC's withholding of key data of vital public interest.

The Local plan should rightly reflect the Town Plan, but also address its many flaws eg an unrealistic 40% expansion of retail.

Attached documents:

Comment ID: SQLP16/1661  Respondent: 11080097 / David & Julia Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

Attached documents:

Comment ID: SQLP16/1049  Respondent: 11114721 / Elizabeth Wilcockson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

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

Over 20,000 responses objected to the 2014 draft Plan and therefore I Object that this Plan is not materially different and the Consultation Process has not been properly followed for this Plan.
I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

Objections to Proposed Submission Local Plan

I object to certain policies set out in the Proposed Submission Local Plan which pertain in particular to Send and the surrounding area, as follows:

1. I object to the fact that a number of the policies included in the Proposed Submission Local Plan have not been raised for prior consultation and were not included in the Regulation 18 draft, in particular Policies A43, A43A and These policies have not been included in previous drafts of the plan which were subject to full consultation, and I object to the fact that these significant development proposals have been introduced for the first time in this final version of the plan and there has been no opportunity for residents to comment on them.

Bisley Camp is the internationally recognised body/home of world target shooting and the NRA is a registered charity with a Royal Charter and serves 30,000 target shooting members and affiliates in the UK. The NRA wish to express an interest in participating at the Examination in recognition of the importance that the policies of the new local plan will have upon the interests of the NRA specific to the continued success and appropriate potential future improvements of the facilities at Bisley. The importance of the leisure and visitor experience and the significant contribution this sector makes to the Borough's economy should be reflected as part of the Local Plan process. The NRA wish to contribute and engage directly as one provider of a leisure and tourism attraction within the Borough accordingly.

Bisley Camp is the internationally recognised body/home of world target shooting and the NRA is a registered charity with a Royal Charter and serves 30,000 target shooting members and affiliates in the UK. The NRA wish to express an interest in participating at the Examination in recognition of the importance that the policies of the new local plan will have upon the interests of the NRA specific to the continued success and appropriate potential future improvements of the facilities at Bisley. The importance of the leisure and visitor experience and the significant contribution this sector makes to the Borough's economy should be reflected as part of the Local Plan process. The NRA wish to contribute and engage directly as one provider of a leisure and tourism attraction within the Borough accordingly.
I think there needs to be an extended consultation period to address the above critical issues.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1927</th>
<th>Respondent: 11458241 / Bewley Homes</th>
<th>Agent: Bewley Homes Plc (David Neame)</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer: (Yes)</td>
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</table>

Neame Sutton Limited acting on behalf of Bewley Homes Plc is proposing a number of additional and/or alternative housing allocations in various settlements in the Borough. Furthermore, fundamental objections are raised in relation to the Council's housing delivery strategy including in specific relation to a number of proposed allocations and, the total number of dwellings it is proposing to provide over the Plan period. Objections are also raised in relation to the evidence base, particularly the Sustainability Appraisal and Green Belt Study.

These are all complex issues that Bewley Homes would wish to address the Inspector directly on at the appropriate Examination sessions.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1907</th>
<th>Respondent: 12108513 / Caroline Wilberforce</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer: (Yes)</td>
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</table>

Examination in Public
We wish to appear at the forthcoming Examination in Public to present our case on this matter.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1862</th>
<th>Respondent: 12316001 / Vail Williams LLP (Jane Terry)</th>
<th>Agent:</th>
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<tbody>
<tr>
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Question 5: Examination

**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

In order that the adequacy of Self-build and Custom provision can be fully considered in the light of up to date information on the council's register.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1905</th>
<th>Respondent: 12316001 / Vail Williams LLP (Jane Terry)</th>
<th>Agent:</th>
</tr>
</thead>
</table>
Yes.

In order that the adequacy of SANG provision both within the Borough and cross boundary into Waverley can be fully considered.

Attached documents:

**Comment ID:** SQLP16/1978  **Respondent:** 13579713 / Roger Daniels  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

Yes.

Lightwood Strategic wishes to participate in the Examination to amplify its responses to this consultation; to provide further evidence on matters, issues and questions that will be identified by the Inspector; and to contribute to discussions with the Inspector and other participants on the basis of its knowledge and experience of the issues.

Attached documents:

**Comment ID:** SQLP16/594  **Respondent:** 14143457 / Hermes Investment Management Limited  **Agent:** Turley (P Keywood)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

Hermes Investment Management Limited wishes to be participate in the Examination for the Proposed Submission Local Plan on grounds it is a stakeholder in a key site within Guildford Town Centre and would welcome the opportunity to test the Council's position on the elements of the plan, particularly site allocations which are the subject of the representations it has made.

Attached documents:

**Comment ID:** SQLP16/581  **Respondent:** 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

The Guildford Vision Group would like to challenge elements of the Local Plan at the Examination, and would wish to be accompanied by expert witnesses where appropriate, especially in connection with town centre infrastructure matters.

The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
3. Redirection of vehicle traffic away from the centre
4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

These are not unusual or unique objectives. They are the aim of a multitude of UK towns and cities, where many have taken positive action to bring them about. Many would envy Guildford its magnificent setting and the river running through the centre of town, yet Guildford has failed significantly over the past decades to take full advantage of its potential, especially its river. Riverside areas are taken up by surface car parks, buildings with their back to the water and suffer a legacy of piecemeal, unattractive light industrial development.

Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:

- Our 2013 document ‘Guildford on the Way’, a Vision for Guildford in 2030 (attached) as articulated by members of the public, Guildford residents and our members
- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

The single, most significant omission regarding the town centre and its infrastructure is a cohesive plan to redirect traffic away from the centre via a new East/West link as proposed by GVG. This was mentioned in our previous Local Plan 2014 submission. A sketch of the link is reproduced here with the new rail/river bridge arrowed:

[see attached file GVG bridge route]

Such a link would instantly enable wider pedestrianisation of the town centre – specifically Bridge and Onslow Streets – bringing a safer, less polluted environment. The bridge would also enable the reinvigoration of the riverside on both sides, below the bottom of North and High Streets, and the demolition of the ugly four lane concrete Friary Bridge that blights the character of our historic gap town at its very centre.

There is no attempt in the Local Plan to safeguard any potential route for such a new East/West link.

Attached documents:  ❯ GVG bridge route.jpg (58 KB)
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1171</th>
<th>Respondent: 15062145 / Philippa Hackett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
<td></td>
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</tbody>
</table>

I object to the Council not following due process. Since the last Draft Local Plan every site in the village of Send has been changed. Not only locations but also in housing numbers. Even as recently as 5th April 2016 there was a document released giving information on the New Local Plan with links to maps and now there are massive changes, even since the publication of this document. My understanding is that following the rejection of the Draft Local Plan the Council could only push forward under Regulation 19 if there were not significant changes. In Send, None of the 485 new homes was included, the site at Garlick’s Arch was not included, the land west of Winds Ridge and Send Hill was not included and the removal of Send from the Green Belt was not included. These are major changes to the plan for the village of Send. If this amount of change is to be proposed then we need to go back and have a full consultation under Regulation 18.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1191</th>
<th>Respondent: 15062145 / Philippa Hackett</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
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</tbody>
</table>

I object to the Council not following due process. Since the last Draft Local Plan every site in the village of Send has been changed. Not only locations but also in housing numbers. Even as recently as 5th April 2016 there was a document released giving information on the New local plan with links to maps and now there are massive changes, even since the publication of this document. My understanding is that following the rejection of the Draft Local Plan the council could only push forward under regulation 19 if there were not significant changes. In send, none of the 485 new homes was included, the site at Garlick’s Arch was not included, the land west of Winds Ridge and Send Hill was not included and the removal of Send from the Green Belt was not included. These are major changes to the plan for the village of Send. If this amount of change is to be proposed then we need to go back and have a full consultation under Regulation 18.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/28</th>
<th>Respondent: 15064481 / Colin and Sue Henderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
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</tbody>
</table>

To whom it may concern,

I object to the above proposal for the following reasons and want this message to be seen by the Inspector.

Firstly, I object to the fact that these proposals were added to the agenda at the last minute in the May meeting of this year. This alone is underhand, not to add reprehensible.

Secondly, G.B.C. have invalidated the whole process by not following the official guidelines and following procedures. A full consultation is required. This is a new proposal involving 400 + houses and warehouses.

**Attached documents:**
7) I object to last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

---

Objection to Proposed Local Plan

Please Note: I want my comments to be seen by the Inspector and please make your responses personal.

GBC have made significant changes to proposed developments in and around Send and Ripley and now seem to propose the building of 485 houses and a full new road junction on the A3 at Burnt Common, but there is no indication of another full consultation. I object to this as GBC have invalidated the whole process by trying to use Regulation 19 rather than the correct course of action detailed in Regulation 18.

Attached documents:

---

I object to GBC having not followed the correct Process for the planning. They way you have changed the development plan is significant and required another full consultation under Regulation 18.

Attached documents:

---

I would like to comment on the above by saying I Object strongly against the preposed plan.

The reasons for my objection are as follows.

GBC did not follow the correct process and consultation period under regulation 18. Rather than the short cut that GBC are trying to use regulation 19.

Attached documents:
Comment ID: SQLP16/695  Respondent: 15086017 / Shuli Sinai  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

**Attached documents:**

---

Comment ID: SQLP16/614  Respondent: 15098945 / ALISON TURNER  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** (Yes)

I am a local resident and would like to be involved.

**Attached documents:**

---

Comment ID: SQLP16/97  Respondent: 15099489 / Christine Vinten  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I am writing to object to certain aspects of the local plan that GBC approved on 24th May. I understand that there is a six week consultation period and I would be grateful if you could ensure my comments are put forward to the Inspector.

1. The GBC have not followed the correct process following significant changes from the 2014 proposals. I believe that these require a full consultation under Reg 18 and that by using Reg 19 the whole process is invalidated.

**Attached documents:**

---

Comment ID: SQLP16/98  Respondent: 15099745 / Duncan Vinten  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I am writing to object to certain aspects of the local plan that GBC approved on 24th May. I understand that there is a six week consultation period and I would be grateful if you could ensure my comments are put forward to the Inspector.

1. The GBC have not followed the correct process following significant changes from the 2014 proposals. I believe that these require a full consultation under Reg 18 and that by using Reg 19 the whole process is invalidated.

**Attached documents:**
Comment ID: SQLP16/104  Respondent: 15102209 / Martin Manktelow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

OBJECTION

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].

Whilst I accept that every village has to grow and evolve, the proposals for Send Village are enormous and far reaching. Until about 10 days before the proposed Local Plan was launched the proposals for Send Village were comparatively low and with a few exceptions could possibly have been supported. However, as stated, 10 days before the approval a site was withdrawn and another, Garlick’s Arch (Policy 43a) was substituted. This adjusted the number of proposed houses from 185 to 485. The manner in which this Plan was inserted at a meeting at Guildford Borough Council which I attended was run in an appalling way. The Councillors who objected were belittled and laughed at by the Lead Councillor and the Mayor.

Attached documents:

Comment ID: SQLP16/109  Respondent: 15104673 / Robert Morley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

Comment ID: SQLP16/113  Respondent: 15106689 / Joseph Hine  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

Firstly i would like to express my irritation to only learn of the plan from a stall at Ripley farmers market, as the council is elected to represent all residents why are you not informing us about this plan openly and honestly to show the consultation with your constituents happens rather then treating it as an inconvenience to your proposals.

Attached documents:

Comment ID: SQLP16/116  Respondent: 15107777 / Paul Ayers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I am a resident of Send and am writing to object to various aspects of the recently published Plan – above.

Firstly I object to the extremely limited consultation period and the last minute inclusion of new sites such as Garlick’s Arch.
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/124</th>
<th>Respondent: 15107937 / Ken Harding</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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I must also object to the limited consultation period as it leads me to believe this was
to minimise the involvement of local interested parties and objections to the plan.
The last minute inclusion of new sites with less than 2 weeks notice begs the question
as to what is really going on? I must therefore register my objection to this.

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/127</th>
<th>Respondent: 15109601 / Louise Majithia</th>
<th>Agent:</th>
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<tbody>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Guildford borough Council have not followed the correct process when proposing these new developments. They are
trying to take the short cut of using regulation 19, instead of following regulation 18 as they should.

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/140</th>
<th>Respondent: 15111905 / Wendy Reed</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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I OBJECT TO the limited consultation period and last minute inclusion of new sites with less than 2 weeks notice - THIS IS UNACCEPTABLE

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/141</th>
<th>Respondent: 15112769 / Gordon Laidlaw</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Insufficient time has been given to allow locals to be involved in the discussion of these plans.
The way in which they have been launched is most unreasonable.
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<thead>
<tr>
<th>Comment ID: SQLP16/144</th>
<th><strong>Respondent:</strong> 15114017 / Jo Wright</th>
<th><strong>Agent:</strong></th>
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<td><strong>Answer:</strong> ()</td>
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<tr>
<td>I object to the way in which the Garlick’s Arch development was added to the local plan.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/146</th>
<th><strong>Respondent:</strong> 15114145 / Barry Roads</th>
<th><strong>Agent:</strong></th>
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<td><strong>Answer:</strong> ()</td>
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<tr>
<td>1. I object to the Council bringing this proposal in without any Community consultation and the lack of time given to object.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/147</th>
<th><strong>Respondent:</strong> 15114657 / Jane Hill</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td><strong>Answer:</strong> ()</td>
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<tr>
<td>4) I object to the limited consultation period.</td>
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<tr>
<td>5) I object to the last minute inclusion of new sites with less than 2 weeks notice.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/148</th>
<th><strong>Respondent:</strong> 15114721 / Leslie Macnair</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td><strong>Answer:</strong> ()</td>
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<tr>
<td>4 I object to the limited consultation period</td>
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<tr>
<td>5 I object to the last minute inclusion of new sites with less than two weeks notice</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/149</th>
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<tr>
<td>5 I object to the last minute inclusion of new sites with less than two weeks notice</td>
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<tr>
<td>Comment ID: SQLP16/150</td>
<td>Respondent: 15114753 / Lauren Pott</td>
<td>Agent:</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
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<tr>
<td>I object most strongly to the limited consultation period</td>
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<tr>
<td>I object most strongly to the last minute inclusion of new sites with less than two weeks notice</td>
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| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/814</th>
<th>Respondent: 15127777 / Keith Hammond</th>
<th>Agent:</th>
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<tbody>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td><strong>Answer:</strong> ()</td>
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<tr>
<td>Previous feedback ignored</td>
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<tr>
<td>The revised Local Plan says it took onboard the submissions made following the previous Draft Local Plan. This is absolute nonsense.</td>
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<tr>
<td>The Draft Local Plan had an unprecedented response which was almost unanimous in rejecting the plan in almost its entirety as being fundamentally flawed. The subsequent amendments made to the plan were miniscule tinkering at the edges. To even suggest such a claim that the submissions made were taken onboard is absurd.</td>
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</table>

| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/164</th>
<th>Respondent: 15131969 / Samuel Holwell</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
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<tr>
<td>I write this email in an enraged mood to illustrate my strong objection to your underhand and cynical development plans on the whole but principally regarding those at Garlicks Arch and Wisley Airfield. My objections relate to numerous areas:</td>
<td></td>
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<tr>
<td>Firstly, the GBC have not followed the correct procedures, as it is my understanding that a further consultation was required for the new development plan to go forward, which has not occurred.</td>
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| Attached documents: |

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<thead>
<tr>
<th>Comment ID: SQLP16/176</th>
<th>Respondent: 15136481 / Roy Padgett</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td><strong>Answer:</strong> ()</td>
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</tbody>
</table>
g. I object to the limited consultation period.

h. I object to the addition of new sites with less than 2 weeks notice.

Attached documents:
I object to the last minute inclusion of new sites with less than 2 weeks’ notice, so someone could go on holiday and come back to find this!

Attached documents:

Comment ID: SQLP16/1368  Respondent:  15138273 / David Latin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
Little notice has been taken of the comments received after the last round of consultation.

Attached documents:

Comment ID: SQLP16/196  Respondent:  15138849 / Anne Walters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

Comment ID: SQLP16/1301  Respondent:  15140225 / Stephen Reed  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I OBJECT TO the limited consultation period and last minute inclusion of new sites with less than 2 weeks notice - THIS IS UNACCEPTABLE

Attached documents:

Comment ID: SQLP16/192  Respondent:  15140289 / Francis Pearse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I object.

Attached documents:

Comment ID: SQLP16/1293  Respondent:  15140417 / Jeff Greenwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I object to the last minute inclusion of new sites with less than 2 weeks notice
I object to the limited consultation period

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/202</th>
<th>Respondent: 15140481 / Jayne Grant</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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4) I object to the limited consultation period
5) I object to sneaky last minute inclusion of new sites

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1358</th>
<th>Respondent: 15140513 / Julie Wilkinson</th>
<th>Agent:</th>
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<tbody>
<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</table>

This consultation has not been fair, with a limited consultation period and last minute changes with the inclusion of new sites.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1295</th>
<th>Respondent: 15140641 / Sandra Greenwood</th>
<th>Agent:</th>
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<tbody>
<tr>
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</table>

I object to the last minute inclusion of new sites with less than 2 weeks notice
I object to the limited consultation period

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1365</th>
<th>Respondent: 15140705 / Simon Moxon</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
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Your consultation period has been minimal and not allowed enough time for people to fully take in the massive changes proposed.

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<tr>
<td>We OBJECT to the limited consultation period</td>
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<tr>
<td>We OBJECT to the last minute inclusion of new sites with less than 2 weeks notice</td>
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<td>I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice</td>
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<td>Answer: ()</td>
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<tr>
<td>The last minute inclusion of new sites with less than 2 weeks notice and the limited consultation period I object to.</td>
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<td>Attached documents:</td>
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<td>Answer: ()</td>
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<tr>
<td>I object to the limited duration of the consultation period</td>
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<td>I object the inclusion of new sites with less than 2 weeks notice</td>
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<td>Attached documents:</td>
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<tr>
<td>Comment ID: SQLP16/210</td>
<td>Respondent: 15142977 / Paulina Adair</td>
<td>Agent:</td>
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<td>Answer: ()</td>
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<tr>
<td>Apparently there are irregularities in how the local plans were changed. The significant changes such as building 485 houses in Send instead of previously agreed number of 185 require another full consultation under Regulation 18 and not the shortcut of Regulation 19, the approach taken by GBC.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/211</th>
<th>Respondent: 15143073 / Sharon Rankin</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/212</th>
<th>Respondent: 15143297 / Ronald Mounsey</th>
<th>Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer: ()</td>
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<tr>
<td>1. I OBJECT to the limited consultation period.</td>
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<tr>
<td>2. I OBJECT to the last minute inclusion of new sites with less then 2 weeks notice.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/213</th>
<th>Respondent: 15143393 / Susan Mounsey</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer: ()</td>
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<tr>
<td>1. I OBJECT to the limited consultation period.</td>
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<tr>
<td>2. I OBJECT to the last minute inclusion of new sites with less then 2 weeks notice.</td>
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<tr>
<th>Comment ID: SQLP16/214</th>
<th>Respondent: 15143553 / Danielle Rixon</th>
<th>Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer: ()</td>
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<td>I object to the Unrealistic and unfair consultation period. I object to the fact there is a possibility of inclusion of new sites with only a mere two weeks notice.</td>
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<tr>
<td>Attached documents:</td>
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</table>
I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

I have to say that I am very disappointed that the Local Authority has only allowed such a short period for discussion and either support or objection.

I urge the local authority to cancel these proposals and to follow the proper procedures that are laid down for the protection of our countryside.

I object to the last minute inclusion of new sites - specifically Garlick’s Arch.

I object to the inclusion of the development at the Wisley airfield site despite it being rejected at planning.

I also object to Policy A43 Garlick’s Arch as this substantial development was included in the Draft Local Plan at the last minute with less than two weeks’ notice and insufficient consultation.
<table>
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<tr>
<th>Comment ID: SQLP16/250</th>
<th>Respondent: 15150593 / Janna McClean</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer: ()</td>
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</table>

  1. The outrageously limited consultation period.
  2. The disgraceful last minute inclusion of new sites with less than three weeks notice?

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/253</th>
<th>Respondent: 15154625 / Jacky Sutton</th>
<th>Agent:</th>
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<tbody>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer: ()</td>
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I object to the limited consultation period...

I object to the last minute inclusion of new sites with less than two weeks notice...

**Attached documents:**

<table>
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<tr>
<th>Comment ID: SQLP16/260</th>
<th>Respondent: 15156609 / stewart Gibbons</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer: ()</td>
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I would like to object to planned building of 700 homes per year, the area of Send does not have sufficient infrastructure to support this type of expansion. There are insufficient schools, road and transport system. Will destroy the village and its uniqueness, turn the whole area into a massive Conurbation.

The process which this has been proposed contravenes not only planning commitment and guidance as laid down by the government for green belt, but also has ignored due process.

I object to further development for the following reasons. With advent of the UK exit from the EU, the prediction for the requirement for housing and development of commercial units will need to be revised downwards. As the 3 million EU citizens currently in the UK, will be affected by this current event, and their ability to stay in this country will also be affected. So your estimates for further development of housing are wildly exaggerated and need to be revised downwards.

In addition to the potential down grade in the economy due to Brexit, your estimation for commercial and housing development is wildly exaggerated and unnecessary. Given you have allowed development of Send marina; I really don’t understand how you can commit to further commercial developments. So therefore this development is folly this area does not need.

In particular, I want to object to all the following points:

I object to Garlicks Arch development of green belt land which contravenes government guide lines and that due process was not followed in the introduction of this development into this plan, and did not follow this process. Its inclusion in this plan was included at the last stage and did not follow process. So for that reason should be excluded.

I object to the council changing the enclosure of green belt land round the Ripley and Send villages, changing of village boundaries to allow for future development.
I object to the wholesale destruction of green belt land in this area (including development of 2000 homes at Gosden hill farm, Merrow, and also Send and Ripley), which contravenes directly the government stated commitment to preservation to green belt land.

I object to the creation of new north and South Bounds slips ways from the A3 to the A247 clandon Road (policy A243) at Burnt common, as in light of the wholly unnecessary due to planned expansion which unlikely be needed within the 10 years.

Attached documents:

---

**Comment ID:** SQLP16/1960  **Respondent:** 15159873 / Martin Smith  **Agent:** Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

In order that sufficient land is made available at the proposed Potential Development Area at Normandy / Flexford to ensure a sustainable and inclusive community and to ensure that sufficient land is made available to deliver objectively assessed housing needs across the Borough.

Attached documents:

---

**Comment ID:** SQLP16/283  **Respondent:** 15174145 / Kathleen Mylet  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

6) I object to the last minute inclusion of new sites with less than two weeks notice.

14) I object to the limited Consultation Period.

15) I object to the fact that Guildford Borough Council has not followed the Correct Process

in their dealings with the Public in putting forward the Guildford Local Plan 2016.

Attached documents:

---

**Comment ID:** SQLP16/289  **Respondent:** 15180193 / Paul Bedworth  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

**GBC Local Area Plan**

I have tried to use the only process but it is too difficult to navigate and I have therefore set out my further objections in this correspondence:-

1.) I object to the process. The correct process has not been followed: Regulation 18 should have been followed bearing in mind the significant changes that have been made to the plans, more widely, and specifically at Burntcommon, (Garlick’s Arch policy A43), and at land west of Winds Ridge and Send Hill (A44). My understanding is that this invalidates the whole process.
2.) I object to the limited consultation period. The impact of the proposal on the locality is so high that further consultation is necessary.

3.) I object to only 2 weeks’ notice being given for the inclusion of new sites in the plan.

Attached documents:

Comment ID: SQLP16/279  Respondent: 15185857 / Matthew Monk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Finally I object to the process GBC have taken to try and implement their ideas. The changes made to cut the houses from 185 to 485 have not had another full consultation, which invalidates the process.

Having stated these points, I believe that it is vitally important that the local plan does not take place, and is re-thought out.

Thank-you for taking the time to rad this, and I would like this to be passed on to the Inspector.

Attached documents:

Comment ID: SQLP16/280  Respondent: 15186273 / Suzannah Monk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Finally I object to the process GBC have taken to try and implement their ideas. The changes made to cut the houses from 185 to 485 have not had another full consultation, which invalidates the process.

Having stated these points, I believe that it is vitally important that the local plan does not take place, and is re-thought out.

Thank-you for taking the time to rad this, and I would like this to be passed on to the Inspector.

Attached documents:

Comment ID: SQLP16/1199  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (No)

N/A

Attached documents:

Comment ID: SQLP16/284  Respondent: 15195969 / Carrie Wheeler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
I object to the fact that we have been given a very little time to digest what the planners have put forward, and put forward our thoughts on the proposals!

Attached documents:

Comment ID: SQLP16/292  Respondent: 15208353 / Janet Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

8) I OBJECT TO the limited consultation period
9) I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

Furthermore

1) Guildford Borough Council (GBC) have not followed the correct process.

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/293  Respondent: 15208417 / Colin Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

8) I OBJECT TO the limited consultation period
9) I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

Furthermore

1) Guildford Borough Council (GBC) have not followed the correct process.

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/294  Respondent: 15208513 / Lauren Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
8) I OBJECT TO the limited consultation period

9) I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

Furthermore

1) Guildford Borough Council (GBC) have not followed the correct process.

Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

Attached documents:
1. **I object to the limited consultation period**

GBC have released this proposal in at the last minute without any consultation whatsoever with the community, and have only allotted six weeks to register objections to a document over 1,800 pages, this is half the usual time.

**Attached documents:**
### Comment ID: SQLP16/340  **Respondent:** 15238881 / Stephen John Tully  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** ()

3. I object to the last minute inclusion of new sites with less than 2 weeks notice.

**Attached documents:**

### Comment ID: SQLP16/342  **Respondent:** 15239425 / Debbie Preece  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** ()

I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than 2 weeks notice.

**Attached documents:**

### Comment ID: SQLP16/1346  **Respondent:** 15241185 / Jill Gooding  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** ()

I OBJECT to the last minute inclusion of new sites with less than 2 weeks notice

I OBJECT to the limited consultation period

**Attached documents:**

### Comment ID: SQLP16/355  **Respondent:** 15241313 / Christine Relf  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** ()

I object to removing Ripley, Send and Clandon from the Green Belt

**Attached documents:**

### Comment ID: SQLP16/361  **Respondent:** 15241345 / Peter Relf  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
**Answer:** ()

I object to development in areas which are at risk of flooding and have done in the past.

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/544</th>
<th>Respondent: 15244097 / Persimmon Homes (Craig Hatton)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: (Yes)</td>
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<tr>
<td>We would like the opportunity to attend the Examination in Public as we believe that the comments, recommendations and observations we have made need to be discussed in a public arena and so that we can outline the reasons for the emerging plan failing the soundness tests as drafted.</td>
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<tr>
<th>Comment ID: SQLP16/374</th>
<th>Respondent: 15245697 / Justine Butler</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: SQLP16/381</th>
<th>Respondent: 15253889 / Carole Gale</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>3) I object to the limited consultation period</td>
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<tr>
<th>Comment ID: SQLP16/386</th>
<th>Respondent: 15256769 / Freda Boyle</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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GBC have not followed correct process. Since 2014 GBC has changed every major site in Send proposed for development and just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185 and has now gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which I believe GBC are trying to do. This invalidates the whole process.

Attached documents:

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Comment ID: SQLP16/406  Respondent: 15264225 / Mel McVickers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

9) I object to the last minute inclusion by the planning authority which only gave 2 weeks notice.

10) I object to the almost non existence consultation period, which is a heavy handed approach forcing something through without due consideration of the thoughts of currant residents.

Attached documents:

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Comment ID: SQLP16/407  Respondent: 15264449 / Elaine McVickers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

9) I object to the last minute inclusion by the planning authority which only gave 2 weeks notice.

10) I object to the almost non existence consultation period, which is a heavy handed approach forcing something through without due consideration of the thoughts of currant residents.

Attached documents:

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Comment ID: SQLP16/411  Respondent: 15265793 / Sam Rowley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

8  I OBJECT TO THE LIMITITED CONSULTATION PERIOD

9  I OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN 2 WEEKS NOTICE

Attached documents:

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Comment ID: SQLP16/412  Respondent: 15266305 / A Andrews  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I object to the draft local plan

I object to the Guildford Borough Council not following the correct procedure for plans put forward at the last minute. It is deceitful and underhand.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/558</th>
<th>Respondent: 15266785 / Trenfold Property Limited and Countryside Properties Limited</th>
<th>Agent: Boyer (Michelle Thomson)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Programmed Submission Local Plan: Strategy and Sites 2016 / Question 5: The Examination</td>
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<tr>
<td><strong>Answer:</strong> Yes</td>
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<tr>
<td>We would like the opportunity to express our concerns regarding the Green Belt assessment, factual errors in the Sustainability Appraisal and other site specific matters which are all explained in detail in the report prepared by Boyer on behalf of Trenfold Property Limited and Countryside Properties UK Limited.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/417</th>
<th>Respondent: 15266977 / Gordon Phillips</th>
<th>Agent: Neonova Design (Mark Brett-Warburton)</th>
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<tr>
<td><strong>Document:</strong> Programmed Submission Local Plan: Strategy and Sites 2016 / Question 5: The Examination</td>
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<tr>
<td><strong>Answer:</strong> Yes</td>
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<tr>
<td>We believe a site for residential development should be located at North Wyke Farm, Guildford Road, Normandy, Surrey, GU3 2AN. This site could include some provision for retail units as part of a mixed uses scheme that would benefit the local community.</td>
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<tr>
<td>The site was included in the GBC SHLAA in December 2012, but subsequently excluded from later proposals. However, GBC has now included a site for 1,100 residential units on the opposite side of the road, which provides confirmation that the location of the North Wyke Farm site is appropriate for residential development.</td>
<td></td>
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<tr>
<td>We would like the opportunity to present suitable evidence at the examination to support the inclusion of North Wyke Farm as a residential or mixed uses site within the Guildford Local Plan.</td>
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<tr>
<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/425</th>
<th>Respondent: 15268545 / Ivan Gale</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong> Programmed Submission Local Plan: Strategy and Sites 2016 / Question 5: The Examination</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
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<tr>
<td>3) I object to the limited time for consultation</td>
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<tr>
<td><strong>Attached documents:</strong></td>
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</tbody>
</table>
Comment ID: SQLP16/449  Respondent: 15273089 / Jason Gaskell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Instead of massive development at one or more sites in Guildford, why not create small pockets of development in all villages across the Borough? This would obviate the need for large scale infrastructure development, would breathe life into moribund communities and allow, through a mix of marketing, affordable and social housing, more people to live in the Borough.

Attached documents:

Comment ID: SQLP16/458  Respondent: 15273697 / Ray Briggs  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (No)

I would like to be sure that the proposed plan and the infrastructure changes proposed are aligned, practical and deliverable, and I do not trust the local council to deliver this.

Attached documents:

Comment ID: SQLP16/1790  Respondent: 15274241 / Chris Finden-Browne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Overall, I object to the way in which Guildford Borough Council have not followed the correct process in creating the draft local plan. Major changes (such as a major new road junction on the A3, and an increase in proposed house building from 185 to 485) require full consultation under Regulation 18; in contrast, GBC have attempted to hide these changes within Regulation 19.

Attached documents:

Comment ID: SQLP16/481  Respondent: 15274465 / Marco De magalhaes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (No)

We have more qualified people in our Parish council to participate at the Examination

Attached documents:

Comment ID: SQLP16/503  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)
Blackwell Farm strategic site is partly within the Parish of Compton and a representative from the Parish Council would wish to attend the examination.

The village of Compton will be severely affected by traffic and congestion if plans go ahead and hence we would also like to be present for discussions relating to infrastructure and highways.

Attached documents:  
- Independent Traffic report annex 3.pdf (2.5 MB)
- Site 26 BWF Annex 4.pdf (456 KB)

Comment ID: SQLP16/533  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: (Yes)

Ripley Parish Council wishes to appear and participate at the Examination and intends to be represented by Counsel for the purpose of supporting their objections and recommended modifications and to respond to any proposals and further information proposed by Guildford Borough Council or the Inspector.

Attached documents:

Comment ID: SQLP16/2013  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

6. Guildford PSLP is the draft Local Development Document proposed to be submitted to the Secretary of State under Regulation 19 of the 2012 Regulations. It seeks to establish the principal land uses for the District. It is accompanied by the Sustainability Appraisal June 2016 which includes the Strategic Environmental Assessment 2016 prepared by AECOM Infrastructure and Environment UK Limited.

7. Preparation of Local Development Documents is covered by Section 19 of the Planning and Compulsory Purchase Act 2004. The PSLP will, in due course be submitted to independent examination under Section 20 of the 2004 Act, subsection (5) of which provides:

“(5) The purpose of an independent examination is to determine in respect of the development plan document -
(a) whether it satisfies the requirements of sections 19 and 24 (1), regulations under section 17 (7) and any regulations under section 36 relating to the preparation of development plan documents;
(b) whether it is sound; and
(c) whether the local planning authority complied with any duty imposed on the authority by section 33A in relation to its preparation. “


11. Regulation 19 of the Local Plan Regulations provides:

“Publication of a local plan 19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must— (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1). Representations relating to a local plan.”
12. RPC are not satisfied that the documents have been made available in accordance with Regulation 19. In particular the Transport Document not being available until 6 June 2016. What RPC describe as “constant alterations to the website throughout the consultation period and, in particular the late substitution of Garlick’s Arch for the previous A43 allocation, which was not disclosed until the publication of the PSLP on 6 June 2016.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/634</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> (Yes)</td>
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</tbody>
</table>

Yes, we are interested in participating at the Examination, to expand on the points we have made in our submission.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1941</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
<th>Agent: The Chine Consultancy Advice Ltd (David Pugh)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td><strong>Answer:</strong> ()</td>
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</table>

Yes, we are interested in participating at the Examination, to expand on the points we have made in our submission.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/588</th>
<th>Respondent: 15282241 / Elena Papazoglou</th>
<th>Agent:</th>
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<td><strong>Answer:</strong> (No)</td>
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</table>

I do not wish to take part in examination. I register my objection to any building on GreenBelt land

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/618</th>
<th>Respondent: 15282593 / Anne Young</th>
<th>Agent:</th>
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<tbody>
<tr>
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<td><strong>Answer:</strong> (No)</td>
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</table>

Do not wish to participate in Examination

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/641</th>
<th>Respondent: 15292129 / Shirley Wilson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</tbody>
</table>
I object to the last minute inclusion of new sites with less than 2 weeks’ notice and seems to be rushed and the effect it will have on the lives of the residences and amenities.

I object that they seemed not to be thought about before putting the plans forward.

I object to the limited consultation period we should more time and time to have information given to us to how this will affect the local schools, roads, traffic and amenities.

Attached documents:

---

Comment ID: SQLP16/642  Respondent: 15294113 / M J Hickman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the late alterations to the numbers of houses required which require further consultation.

Attached documents:

---

Comment ID: SQLP16/1650  Respondent: 15299201 / Samira Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

Attached documents:

---

Comment ID: SQLP16/651  Respondent: 15301409 / Marian Simonds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

4. I OBJECT TO THE LIMITED CONSULTATION PERIOD

5. I OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN 2 WEEKS NOTICE

Attached documents:

---

Comment ID: SQLP16/668  Respondent: 15321729 / Fiona Keywood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than 2 weeks notice.

Attached documents:

Comment ID: SQLP16/670  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than 2 weeks notice.

Attached documents:

Comment ID: SQLP16/673  Respondent: 15322017 / Colin Keywood  Agent: Colin Keywood
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than 2 weeks notice.

Attached documents:

Comment ID: SQLP16/674  Respondent: 15324705 / Isobelle Keywood  Agent: Colin Keywood
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than 2 weeks notice.

Attached documents:

Comment ID: SQLP16/679  Respondent: 15326369 / J D W Todd  Agent: Colin Keywood
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT

GBC HAVE NOT FOLLOWED CORRECT PROCESS.

GBC have been guilty of very underhand sleight of hand procedures in drafting this new plan.
Since 2014 GBC has changed every major site in Send proposed for development and now just added a major new road junction. The southbound off slip road from the A3 at this junction will increase traffic turning right onto the A247 which is already a site of many minor (so far minor!) accidents. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/1367  Respondent: 15326817 / Peter Jennings-Giles  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/680  Respondent: 15329345 / Robin Hurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the Limited Consultation Period.

I find it disingenuous to the last minute inclusion of new sites i.e. Garlick’s Arch with less than two weeks notice, just because it would appear that the developer has offered a new on and off slip to the A3.

Attached documents:

Comment ID: SQLP16/681  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

1. I OBJECT to the way in which this consultation process has been processed by GBC. Many residents remain unaware that such significant proposals are afoot, which will have a 15 year affect on people's lives. If you are not a regular reader of the Surrey Advertiser, you would probably not know anything about the Local Plan. Indeed, the majority of information provided to residents of the borough has been provided by either parish councils or concerned local residents groups such as Wisley Action Group, Save Send Action Group, Ripley Action Group, CPRE and other bodies. This is not acceptable in a democratic society, particularly in view of the fact that the Conservative borough councillors had an election promise to protect the Greenbelt which they fundamentally appear to be totally disregarding. In essence, residents are trusting GBC to uphold their election promises, without being given the information regarding the revised Local Plan. I do not accept that local plan documents held in a small handful of local libraries constitutes appropriate consultation. I have attended many local meetings in Clandon, Send, Merrow and Ripley (all of which have been organised by local bodies, NOT GBC) held to discuss the proposals in the 2016 Local Plan. I can honestly say that there is wholehearted disapproval from every aspect of each community.
In conclusion, this revised 2016 Local Plan is not fit for purpose, is unsound does not represent in any way how most existing residents wish to see their homes, communities and borough develop over the next 15 years.

**Attached documents:**

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<td>Answer: ()</td>
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<tr>
<td>I object to the limited consultation period.</td>
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<td>I object to the last minute inclusion of new sites with less than 2 weeks notice.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<td>Answer: ()</td>
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<tr>
<td>The limited consultation period is insufficient and a decision must be made about the tunnel proposal before the Gosden Hill development can be advanced any further.</td>
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<td><strong>Attached documents:</strong></td>
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<td>Answer: ()</td>
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<tr>
<td>1. GBC HAVE NOT FOLLOWED CORRECT PROCESS WITH THIS LATEST PLAN.</td>
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<tr>
<td>Since 2014 GBC has changed every major site in Send proposed for development, (now standing at some 485 houses and a massive new road junction). These very significant changes should require another full consultation under regulation 18, not a shortcut of Regulation 19 which GBC are attempting to get away with. This undoubtedly invalidates the whole Local Plan Process!</td>
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<tr>
<td>6. GBC HAVE NOT FOLLOWED CORRECT PROCESS WITH THIS LATEST PLAN.</td>
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</table>
Since 2014 GBC has changed every major site in Send proposed for development, (now standing at some 485 houses and a massive new road junction). These very significant changes should require another full consultation under regulation 18, not a shortcut of Regulation 19 which GBC are attempting to get away with. This undoubtedly invalidates the whole Local Plan Process!

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<th>Respondent</th>
<th>Agent</th>
<th>Document</th>
<th>Answer</th>
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<tbody>
<tr>
<td>SQLP16/735</td>
<td>15350465 / Shirley Dicker</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer</td>
<td>Attached documents</td>
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<tr>
<td>SQLP16/753</td>
<td>15353825 / Terry Madgwick</td>
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<tr>
<td>SQLP16/759</td>
<td>15356385 / Mervyn Plumtree</td>
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<tr>
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<td>15356385 / Mervyn Plumtree</td>
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<td>Answer</td>
<td>Attached documents</td>
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<tr>
<td>SQLP16/762</td>
<td>15356513 / Anthony Gatford</td>
<td>Tony Gatford</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Since 2014 GBC has changed every major site in Send proposed for development, (now standing at some 485 houses and a massive new road junction). These very significant changes should require another full consultation under regulation 18, not a shortcut of Regulation 19 which GBC are attempting to get away with. This undoubtedly invalidates the whole Local Plan Process!

Attached documents:

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Comment ID: SQLP16/764  Respondent: 15356833 / Carolyn Gatford  Agent: Tony Gatford

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

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Since 2014 GBC has changed every major site in Send proposed for development, (now standing at some 485 houses and a massive new road junction). These very significant changes should require another full consultation under regulation 18, not a shortcut of Regulation 19 which GBC are attempting to get away with. This undoubtedly invalidates the whole Local Plan Process!

Attached documents:

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Comment ID: SQLP16/773  Respondent: 15357761 / Ross Haimes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

Consultation Period

I was shocked that a plan of this scale with such a devastating effect to the Green Belt, population, culture and infrastructure of the Burpham area is being rushed through with such a short consultation period. The plan was submitted in June and responses need to be received within 6 weeks by 18th July. This is a disgusting blatant attempt to steamroll the voice of the local population in order to get unnecessary additional houses built without due process.

Attached documents:

---

Comment ID: SQLP16/779  Respondent: 15358913 / Lisa Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

7. I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.
6. QUESTION 5: Examination

We wish to express an interest in participating at the Examination as it relates to site A46. We are directly affected by the potential development of this site which is located directly across Westwood Lane and wish to directly present our objections.

Attached documents:

Comment ID: SQLP16/828  Respondent: 15370529 / J Wells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT to the limited consultation period

Attached documents:

Comment ID: SQLP16/871  Respondent: 15385281 / Daniel Tarrant  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object because GBC have not followed correct process. Since 2014 GBC has made changes on every major proposed development in Send proposed and have now added a major road junction. Policy A43a.

The 2014 proposal for 430 house in Send was reduced to 185 in April 2016. In May 2016 policy A43 was added with 400 houses and Industrial units. These significant changes require full consultation under Regulation 18. Regulation 19, which GBC are using is not appropriate in this instance.

Attached documents:

Comment ID: SQLP16/880  Respondent: 15388641 / Eva Hay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

- I object to all the lack of consultation for all the proposed sites in Send. They were not included in the previous consultation in 2014 and all its sites have been changed substantially.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/902</th>
<th>Respondent: 15389697 / Oliver Stewart</th>
<th>Agent:</th>
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<tbody>
<tr>
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I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/908</th>
<th>Respondent: 15390401 / William Stewart</th>
<th>Agent:</th>
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<tr>
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<tr>
<th>Comment ID: SQLP16/913</th>
<th>Respondent: 15391329 / Marian Tarrant</th>
<th>Agent:</th>
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<tr>
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<thead>
<tr>
<th>Comment ID: SQLP16/914</th>
<th>Respondent: 15391905 / Geoff Gear</th>
<th>Agent:</th>
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<tr>
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<td>Answer: ()</td>
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</table>

I strongly object to the final draft local plan and I want my comments below to be seen by the Inspector.

I object to the way that GBC has altered their original plans for the developments in Send and in doing so, are attempting to shortcut the process. Having not followed the correct procedure, this must NOT be allowed.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/936</th>
<th>Respondent: 15400961 / Joan Plumtree</th>
<th>Agent:</th>
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<th>Document page number</th>
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Section page number 97
I object to the last minute inclusion of new sites with less than 2 weeks notice.
I object to the late inclusion of site A43 Garlicks Arch.
I object to the limited consultation period.

Attached documents:

---

**Comment ID:** SQLP16/957  **Respondent:** 15407809 / Valerie Platt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

**Guildford Local Plan 2016 Consultation**

I am responding to your request for residents of the Borough, and other interested parties, to make their views known on the latest Draft Local Plan.

My first comment is that I am deeply shocked to see that little or no attention has been paid to the comments made by a significant number of residents in the last consultation. The overwhelming local view that the Green Belt must be maintained at all costs, and that brown field sites should be used for a large part of the housing needs, has been completely ignored.

Once again the method of communicating to Home Owners and Occupiers is totally unacceptable. In January 2014, I had sent a suggestion of how the Borough might *directly* write to *every* Home Owner or Occupier so that they are fully aware of the proposals. This is because so many key people were not aware of the plan or the needed action. I had an email from the then Councillor in charge of the Local Plan agreeing that their consultation must be improved. This has not been done and so many people may be disenfranchised.

These points above show that the much needed democracy to progress such an important plan is destroying the credibility of the process.

Attached documents:

---

**Comment ID:** SQLP16/984  **Respondent:** 15425025 / Cornelius Johann Jeronimus  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I feel we are sufficiently represented by our parish council.

Attached documents:

---

**Comment ID:** SQLP16/990  **Respondent:** 15425665 / East Clandon Parish Council (Alyson Blackwell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()
7. We object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

We demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

Attached documents:

---

Comment ID: SQLP16/1817  Respondent: 15430049 / Michael Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I object to the limited consultation period, especially as it is during a time when many people have organised their holidays etc.

I object to the last minute inclusion of new sites with less than 2 weeks notice, leaving people very little time or no time at all to even address their concerns. Most people have hectic lives and this must be taken into consideration in local plans.

Attached documents:

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Comment ID: SQLP16/1055  Respondent: 15439585 / Bryan Handcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: (Yes)

Local roads are not suitable for heavy traffic

Attached documents:

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Comment ID: SQLP16/1057  Respondent: 15440609 / S Trower  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

The whole process is very undemocratic and GBC are simply ignoring the wishes of the local population. The plan has been re-issued in virtually the same format as the previous one, and all previous objections have been ignored in the current consultation.

I therefore strongly object to the 2016 Local Plan

Attached documents:

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Comment ID: SQLP16/1060  Respondent: 15441057 / Ruth Busby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

The whole process is very undemocratic and GBC are simply ignoring the wishes of the local population. The plan has been re-issued in virtually the same format as the previous one, and all previous objections have been ignored in the current consultation.

I therefore strongly object to the 2016 Local Plan

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1063</th>
<th>Respondent: 15441249 / Geoff Nicholson</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td></td>
<td>The evidence for expansion is exaggerated (GRA report on housing) and the consultation period has been limited</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1084</th>
<th>Respondent: 15442561 / Tegan Meredith</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td></td>
<td>the recent EU referendum vote will, in the future, withdraw the need for new build housing of this size - this requires an extension of the local plan consultation period</td>
<td>Attached documents:</td>
</tr>
<tr>
<td></td>
<td>I understand that a decision is required on an A3 tunnel before Gosden Hill - the tunnel needs to be operational prior to any local plan decisions</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1088</th>
<th>Respondent: 15442753 / Anne Morgan</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: ()</td>
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<tr>
<td></td>
<td>I object to all proposed sites in Send as they were not included in the previous consultation in 2014. Send residents have not been consulted on any of the new changes and all previous proposals have been considerably altered.</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1102</th>
<th>Respondent: 15446273 / Jane Stevens</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td>Answer: (No)</td>
</tr>
<tr>
<td></td>
<td>• objected 2 years ago When asked in 2014 if we approved of this plan, over 7,000 people wrote expressing their objections. We objected then, we are objecting now. Why are we not being listened to?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

| Document:              | Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination | Answer: (No) |
|                        | N/A | Attached documents: |
Comment ID: SQLP16/1104  Respondent: 15446305 / Mo Adda  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I utterly object to the limited consultation period

Attached documents:

Comment ID: SQLP16/1162  Respondent: 15454625 / Paul Woy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

It really is unacceptable 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. We cannot understand why our clear and wholehearted objections to the Local Plan are ignored.

Attached documents:

Comment ID: SQLP16/1169  Respondent: 15457441 / Margaret Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

4) I object to the limited consultation period.

5) I object to the last minute inclusion of new sites with less than two weeks notice.

Attached documents:

Comment ID: SQLP16/1589  Respondent: 15458081 / K C Meldrum  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

1. I am concerned at the amount of paper that one has to read to understand the key elements of the draft Local Plan. I am equally concerned at the short timescale for the consultation- 6 weeks is too short.

Attached documents:

Comment ID: SQLP16/1954  Respondent: 15460737 / Donna Collinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Guildford Residents Association (GRA) has

- engaged positively in the Local Plan process from the outset,
- agreed “Aspirations for Guildford” and Local Plan consultation responses with the support of 26 Residents Associations and four Parish Councils,
- encouraged and supported residents to participate in the Plan-making process
- through contributions from residents groups, raised funds to commission an expert to review the SHMA, and
- drawn on the knowledge of environmental, planning, engineering, flood risk management, economic, commercial and transport experts to inform its contributions.

GRA does not consider the Plan to be sound for the reasons set out and we wish to make the case for changes we consider necessary to achieve this. These concerns, which relate to the overall approach, manifest themselves in policy throughout the Plan. Hence, our interest is overarching rather than confined to specific issues.

We would like to participate in all matters at the inquiry on behalf of the many residents who have worked together to establish a collective voice through the GRA. We would also like to be accompanied by an expert witness for the SHMA and for transport-related matters.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1179</th>
<th>Respondent: 15461025 / Philip Masters</th>
<th>Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016</td>
<td>Question 5: The examination</td>
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</table>
I object to the limited consultation period.

Attached documents:

Comment ID: SLP16/1180  Respondent: 15461409 / Laura Sawyer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Attached documents:

Comment ID: SLP16/1203  Respondent: 15466113 / Tim Grey  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

BULLET POINT OBJECTIONS RELATING TO WEST CLANDON & IMMEDIATE SURROUNDINGS

• Over 20,000 responses objected to the 2014 draft Plan and therefore I Object that this Plan is not materially different and the Consultation Process has not been properly followed for this Plan.

Attached documents:

Comment ID: SLP16/1204  Respondent: 15466113 / Tim Grey  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

• I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

Attached documents:

Comment ID: SLP16/1309  Respondent: 1546209 / Janet Parry-Morris  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Limited consultation period

I object to the limited consultation period for the Guildford Local Plan. Everyone would have benefitted from a longer period of consideration.
Late additions to the Local Plan

I object to the late additions of parts of the local plan, some with less than two-weeks notice. I’m particularly concerned about the Garlick’s Arch addition and the new A3/Burnt Common junction. These will have considerable local impact and seem to have been introduced with no prior notification or consultation.

Attached documents:

Comment ID: SQLP16/1212  Respondent: 15466945 / A M Wagstaff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I attach a letter of my objections to the 2016 Draft Local Plan. For your information, I have copied my objections as follows:

I am writing to you to voice my objections to this plan. I have lived in the Borough for 27 years, and have never before taken this step, but I am extremely concerned on a number of issues.

1. I object to the fact that this very short consultative period. This is being rushed. It has become clear in recent weeks that insufficient consultation can lead to catastrophically bad decisions.

Attached documents:

Comment ID: SQLP16/1213  Respondent: 15466945 / A M Wagstaff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

1. I object to the fact that, even with such a short consultation period, new development sites were included with only 2 weeks’ notice.

I request that this plan be withdrawn.

Attached documents:

Comment ID: SQLP16/1214  Respondent: 15468769 / David Turner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

Guildford Borough Council have not followed correct process. I strongly feel the council has totally disregarded resident views. The 2014 proposal for 430 houses went down in April 2016 to 185 and now I see it has gone up again to 485. These huge changes should go to full consultation under Regulation 18, not the shortcut of Regulation 19! This makes a mockery of the whole process.

It is very upsetting for our community that GBC are considering the above, I do hope that consideration will be made to the outstanding beauty of our countryside, our historic links and our wildlife and that our Green Belt protection is upheld.
1. I object to GBC not listening to local people in 2015 and continuing to impose the same style of Local Plan in 2016.

More than any other I OBJECT to the limited consultation period.

Which smacks of a lack of forward planning, a rushed, hasty and “desperate catch up “ or “opportune” timescale, to force decisions by stealth or reduce fair and thereby ignore proportionate objection.

This is plainly illustrated by the last minute inclusion of new sites with less than 2 x weeks notice, which I also OBJECT to.

I object to the short consultation period and in particular to the last minute inclusion of more sites.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1363</th>
<th>Respondent: 15506785 / Maverick Hornblow</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> ()</td>
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<td>I object to</td>
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<td>limited consultation period</td>
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<td>last minute inclusion of new sites with less than 2 weeks to go</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/1364</th>
<th>Respondent: 15506817 / Reno Hornblow</th>
<th>Agent:</th>
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<tbody>
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<tr>
<th>Comment ID: SQLP16/1415</th>
<th>Respondent: 15577665 / Grant Angus</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> ()</td>
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<td>I object... with a limited consultation period such as the last minute inclusion of new sites with less than two weeks notice.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/1428</th>
<th>Respondent: 15579457 / RSPB South East Office (Heather Richards)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td><strong>Answer:</strong> (Yes)</td>
<td></td>
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<td></td>
<td>Yes. The RSPB wishes to appear at the Examination. The issues we raise are of a highly specialist nature and will benefit from the ability to comment directly on them and respond to other parties at the relevant examination sessions. We set out our reasons in greater detail in our comments on policies P5 and A35 below.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/1469</th>
<th>Respondent: 15582913 / Nigel Pink</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</table>
I OBJECT TO the limited consultation period VERY SNEAKY LAST MINUTE INCLUSION OF NEW SITES (LESS THAN 2 WEEKS)

Attached documents:

Comment ID: SQLP16/1478  Respondent: 15583361 / Pat Moxon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

Comment ID: SQLP16/1479  Respondent: 15583361 / Pat Moxon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I object to the last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

Comment ID: SQLP16/1480  Respondent: 15583521 / Richard Moxon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I object to the limited consultation period I object to the last minute inclusion of new sites with less than 2 weeks notice

Attached documents:

Comment ID: SQLP16/1487  Respondent: 15583681 / Laurence Pink  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()
I OBJECT TO the limited consultation period

VERY SNEAKY LAST MINUTE INCLUSION OF NEW SITES (LESS THAN 2 WEEKS)

Attached documents:

Comment ID: SQLP16/1482  Respondent: 15583937 / Brian Astley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
I object to the 2016 draft local plan on the following grounds
-the limited consultation period.
-the last minute inclusion of new sites with less than 2 weeks notice.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
<th>Document</th>
<th>Answer</th>
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<tbody>
<tr>
<td>SQLP16/1547</td>
<td>15588033 / Oliver Hogben</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td></td>
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<td></td>
<td>The current GBC Local Plan has been a catalogue of poor consultation, bad decision-making, and practice that is ridden with holes that will not survive the inevitable legal challenge that will follow should these changes not be implemented. Thank you for your consideration of my formal objections to the GBC Local Plan.</td>
<td></td>
</tr>
<tr>
<td>SQLP16/1548</td>
<td>15588673 / Joy Davis</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>The limited consultation period does not give all agencies the opportunity to review the documentation, and present cogent and timely responses to the proposals</td>
<td></td>
</tr>
<tr>
<td>SQLP16/1586</td>
<td>15591041 / Dan Gordon</td>
<td></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>GBC did not properly account for how the report’s figures were arrived at and allowed too short a period of consultation making the Draft Local plan unaccountable and is therefore unsound.</td>
<td></td>
</tr>
<tr>
<td>SQLP16/1605</td>
<td>15593633 / Ila-Maria Patermann</td>
<td>Agent</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>We strongly request that you extend the consultation period by at least another 4 weeks as we don't think the current consultation period is fair on the large number of people that will be negatively impacted by your proposals.</td>
<td></td>
</tr>
</tbody>
</table>
Comment ID: SQLP16/1606  Respondent: 15593665 / Thomas Cope  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Comment ID: SQLP16/1611  Respondent: 15594849 / Andrew Thomas  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

· I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Comment ID: SQLP16/1616  Respondent: 15595585 / Tim Wiggins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I finally object to the multiple revisions of the plan with relatively short notice - only last year a plan was included for commercial development on brownfield sites at Burnt Common - these are now removed. Additionally, the proposed development for 40 houses on Burnt Common Lane was added at the last minute to last year's plan - but subsequently removed. The plan should follow GBC's consultation process without having last minute amendments which cause all concerned a great deal of disturbance.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

Comment ID: SQLP16/1662  Respondent: 15602177 / Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1800</th>
<th>Respondent: 15602529 / Darren Lambert</th>
<th>Agent:</th>
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<tbody>
<tr>
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<tr>
<th>Comment ID: SQLP16/1741</th>
<th>Respondent: 15619073 / Paul Collins</th>
<th>Agent:</th>
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<tr>
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<td>Yes</td>
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<tr>
<th>Comment ID: SQLP16/1747</th>
<th>Respondent: 15623745 / Stella May</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: SQLP16/1779</th>
<th>Respondent: 15630849 / Denton Homes LTD</th>
<th>Agent: Bell Cornwell LLP (Ian Sowerby)</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer: (Yes)</td>
<td>To ensure that the objections are fully debated in public</td>
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<td>Attached documents:</td>
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<table>
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<tr>
<th>Comment ID: SQLP16/1781</th>
<th>Respondent: 15631553 / Anthony Smith</th>
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</table>
2. I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

Attached documents:

Comment ID: SQLP16/1785  Respondent: 15632289 / Claire Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

Having reviewed the Local Plan I want to express my concerns over many aspects of the development included. I feel the Council has ignored objections residents made in the 2014 consultation, showing a complete lack of consideration for the impact such extensive development will have in the local area.

I object to the Council making substantial last minute changes to the plan, such as the Garlick’s Arch development in Send and the addition of a major alteration/enlargement of the junction on the A3 at Burnt Common. There are also many other significant changes to the 2014 plan. This requires a full consultation under Regulation 18, not the limited consultation under Regulation 19 for minor changes.

I think the brief six week Local Plan consultation, placed in summer when many people are away on holidays, is a deliberate act to limit residents’ opportunity to fully review the extensive documentation comprised in the Plan and to then make any appropriate objections if required.

I object to both these developments on the grounds that there was improper use of Regulation 18; no local consultation; that Garlick’s Arch is green belt land which includes an area of ancient woodland and parts of which are low lying and subject to flooding.

I object to the alteration to the A3 junction at Burnt Common, as it has not been part of a full infrastructure review and proper consultation with local residents. It was added to the plan at the last minute to avoid proper scrutiny.

Attached documents:

Comment ID: SQLP16/1787  Respondent: 15633217 / Emma Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()

I object to the way in which many items of the local plan have been introduced. I do not believe Guildford Borough Council have followed correct process by introducing last minute additions and alterations which warrant a full consultation period not the short cut that it appears to be.

Attached documents:

Comment ID: SQLP16/1804  Respondent: 15637633 / Scott Kent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Answer: ()
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

**Comment ID: SQLP16/1826  Respondent: 15645537 / Francis Garguilo  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

There has been no consultation with local residential bodies such as Resident Associations or Parish Councils.

**Attached documents:**

---

**Comment ID: SQLP16/1850  Respondent: 15652033 / James Scrace  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I object to the last minute inclusion of new sites with less than 2 weeks notice prior to the agreement of the inclusion at full council meeting, the limited consultation period - especially considering the severity of the last minute change, and the lack of transparency on the part of the council with regard to the aforementioned "foot in the door developments" on greenfield sites earmarked for mass development in the last minute amendment i.e. Garlicks Arch.

**Attached documents:**

---

**Comment ID: SQLP16/1868  Respondent: 15658465 / Michael Cuell  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

The limited consultation period, purposely designed to steamroller objections and push these plans through against the will of the people.

The last minute inclusion of new sites with less than two weeks notice is a sham.

**Attached documents:**

---

**Comment ID: SQLP16/1869  Respondent: 15658497 / Philip Willians  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Answer:** ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch, should have required another full consultation, which did not happen. This invalidates the whole process.
<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
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</thead>
<tbody>
<tr>
<td>SQLP16/1888</td>
<td>15665697 / Elizabeth Cross</td>
<td></td>
</tr>
<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer</td>
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<tr>
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<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
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</thead>
<tbody>
<tr>
<td>SQLP16/1895</td>
<td>15666113 / Barrat David Wilson Homes (Nick Keeley)</td>
<td></td>
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<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
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<tr>
<td>Answer</td>
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<td></td>
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<tr>
<td>Yes, we would like to participate in the Examination at that stage please.</td>
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</table>

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>SQLP16/1917</td>
<td>15670785 / Mr and Mrs Poulsom</td>
<td>Vail Williams LLP (Jane Terry)</td>
</tr>
<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer</td>
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<td></td>
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<tr>
<td>Yes</td>
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<tr>
<td>In order that the adequacy of the Green Belt Study, the proposed new Green Belt designation and its compliance with the principles of Green Belt designation are fully considered.</td>
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<table>
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<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
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<tbody>
<tr>
<td>SQLP16/1918</td>
<td>15671201 / Susannah Parker</td>
<td></td>
</tr>
<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td>Answer</td>
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<tr>
<td>There has also been a very limited period of consultation for this scale of development</td>
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<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
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<tbody>
<tr>
<td>SQLP16/1925</td>
<td>15674561 / Andy Stallan (WYG)</td>
<td></td>
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<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</tbody>
</table>
The owners of the Burnt Common site consider that the BCN site should be in the submission local plan as an allocated site, for the reasons set out in the accompanying WYG representation letter dated 15th July 2016. They reserve their right to participate in the examination depending on the outcome of the current consultation and the content of the submission local plan. The purpose of participating in the examination will be to test the content of the plan, particularly in relation to the BCN and GA sites but not solely, and demonstrate to the examination inspector that the plan is not sound without the inclusion of the BCN site as an allocated site.

Attached documents: 160713_LP1_Representation_on_behalf_of_the_NRA_DRAFT_002_2 (1).pdf (287 KB)
I object to the limited consultation period

I object to the last minute inclusion of new sites with less than two weeks’ notice

I object to Garlick’s Arch development because of the highly questionable way it was slipped into the Local Plan at the last minute without any prior consultation

Please find below my comments to the GBC Local Plan, in time for the 11.59 deadline today. I would appreciate confirmation of your receipt of this email.

Comments and Objections

We appear to have had very little time to read and understand all the many documents for this new local plan. Time has been extremely tight to be able to do so. Timescales should have been extended. Additionally to have the deadline around holiday season is more than unfortunate.
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2050</th>
<th>Respondent: 15705281 / Anna-Maria Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
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</table>

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

Firstly, I would like to highlight that it is highly irresponsible that the council has set a 6 week public consultation period as the proposed submission has the potential for devastating, long term effects on our local villages.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2066</th>
<th>Respondent: 15705857 / GRH Hampshire</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td><strong>Answer:</strong> ()</td>
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</table>

The tactics of the Council bring it into disrepute. Insisting that this is a new plan so we all have to write in again is an abuse of the system.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2091</th>
<th>Respondent: 15717217 / Ian Ferguson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
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</tr>
</tbody>
</table>

I note that their appears to be a very limited consultation period why?

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2129</th>
<th>Respondent: 15733665 / Vortal Properties Ltd</th>
<th>Agent: Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td><strong>Answer:</strong> ()</td>
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</tbody>
</table>

**QUESTION 5: EXAMINATION**

Our clients’ in their 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.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2130</th>
<th>Respondent: 15733665 / Vortal Properties Ltd</th>
<th>Agent: Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<tr>
<td><strong>Answer:</strong> ()</td>
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</tbody>
</table>
QUESTION 5: EXAMINATION

Our clients’ in their 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.

Attached documents:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

Our Client wishes to reserve the right to attend the Examination. They are the owner of Site A45 Land to the rear of the Talbot, High Street, Ripley and thus wish to reserve the right to attend the Examination in order to; clarify any elements relating to the site allocation, site capacity and/or the implications of any plan policies for the delivery of the allocation.

Attached documents:

Comment ID: SQLP16/1906  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (Yes)

We consider that it will be beneficial to discuss in further detail our comments and proposed amendments to the policies referred to in our representations. We will be pleased to discuss in further detail the proposals for Sites A43 & A43a, and to provide a further update on the technical work being undertaken to further demonstrate the suitability and deliverability of this allocation.

Attached documents:

Comment ID: SQLP16/2029  Respondent: 15922337 / Andrew Malcher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: ()

I object to the Consultation Procedure. There are many areas of the Plan which are open to question. This is a large, complex series of documents which requires in depth study and as such the short consultation period is undemocratic.

Attached documents:

Comment ID: SQLP16/1421  Respondent: 17969537 / N Giles Ltd (Sir or Madam)  Agent: Vail Williams LLP (Jane Terry)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Answer: (No)
In order that the most effective and efficient use of available land is made within the Plan.

Attached documents:

Total records: 450.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Question 6 of the 2016 consultation and question 5 of the 2017 consultation asked respondents about the content of the plan. All representations about the content of the plan have been recorded against the relevant section, chapter or policy.

The report does not contain any records.

Total records: 0.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Question 6 (2017) and 7 (2016) - Any other comments?
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

**Question 7 (2016):** Do you have any other comments that have not been covered by the previous questions?

**Question 6 (2017):** Do you have any other comments that have not been covered by the previous questions?

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/289</th>
<th><strong>Respondent:</strong> 8555425 / Historic England (Alan Byrne)</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td>Answer: ()</td>
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<tr>
<td>Targeted consultation on Guildford Borough Council’s Proposed Submission Local Plan (2017)</td>
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<tr>
<td>Thank you for your email of 8 June 2017 inviting comments on the above document.</td>
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<tr>
<td>As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and welcomes the opportunity to comment upon this key planning document.</td>
<td></td>
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</tr>
<tr>
<td>Historic England’s is content with the proposed changes to the draft Local Plan in as far as they relate to its remit. In our letter of 15 July 2016 we noted a number of issues that we believed should be addressed in future iterations of the plan and this has largely been done. We still have some concern that the link between the evidence base for the historic environment and the plans policies on heritage (see earlier letter) is not demonstrated as clearly as it might be but this is a matter for drafting rather than a fundamental deficiency.</td>
<td></td>
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<tr>
<td>Historic England would strongly advise that the Council’s own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 126).</td>
<td></td>
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<tr>
<td>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: pslp17q/277</th>
<th><strong>Respondent:</strong> 8555489 / Alan Norris</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td>Answer: ()</td>
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<tr>
<td>Finally a couple of spelling errors:</td>
<td></td>
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</tr>
<tr>
<td>Page 22 - first paragraph, 3rd line = located mispelt as loacted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Page 328, Open Space OS6 = Spoil Road should be Spoil Lane, Tongham (Spoil Lane is shown correctly on Policy A31)</td>
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<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
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<tr>
<td>Comment ID: SLP16/2064</td>
<td>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</td>
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<td>------------------------</td>
<td>---------------------------------------------------------------</td>
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<tr>
<td>Agent:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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</tr>
<tr>
<td>Answer: ()</td>
<td>Residents wish to register concern and disappointment at the poorly judged decision to produce, promote and spend public money on a film to represent the views of “some residents”. A number of those “residents” represent institutions that have interests in proposed development that were not declared. There was no attempt to achieve balance. The film was inconsistent with the fair approach proposed in the Statement of Community Engagement. Use of the video on the Local Plan homepage could bias the Regulation 19 consultation. The suggestion that housing proposed will make a material difference to affordability or that congestion will be solved by development is to be tested. Indeed, the traffic evidence was not available when the video was produced and some of the data needed to assess congestion is not yet available.</td>
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<td>Attached documents:</td>
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<thead>
<tr>
<th>Comment ID: SLP16/2026</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
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</thead>
<tbody>
<tr>
<td>Agent:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
</tr>
<tr>
<td>Answer: ()</td>
<td>Where possible, the Guildford Society wishes to support Guildford Borough Council’s attempts to adopt a new, sound, progressive and regenerative Local Plan.</td>
</tr>
<tr>
<td></td>
<td>We do not agree with some fundamental points – noted herein and in our full submission – and we are concerned that misguided public relations stunts such as the publicly-funded video may skew responses or underpin objectors’ scepticism so as to make the Local Plan process more challenging.</td>
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<tr>
<td>Attached documents:</td>
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</table>

<table>
<thead>
<tr>
<th>Comment ID: SLP16/2027</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
</tr>
<tr>
<td>Answer: ()</td>
<td>The Guildford Society</td>
</tr>
<tr>
<td></td>
<td>The Society started life as the ‘Old Guildford Society’ in 1896, spurred into action by the celebrated designer William Morris who wrote a letter to a prominent local art historian, George Williamson, urging him to form a ‘watching committee’ to guard against threats to Guildford’s unique High Street. It engaged in a number of campaigns, disbanding in 1902.</td>
</tr>
<tr>
<td></td>
<td>Re-formed as ‘The Guildford Society’ in 1935, campaigning restarted to protect Guildford’s unique character. The issues then are as now – how to preserve the best whilst accommodating growth and development in a gap town, bisected by a river and surrounded by beautiful Green Belt countryside of which there are grand views from within the town’s centre and boundaries.</td>
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<table>
<thead>
<tr>
<th>Comment ID: SLP16/2022</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
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<tbody>
<tr>
<td>Agent:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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<tr>
<td>Answer: ()</td>
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</tr>
</tbody>
</table>
By 1960, 57 listed buildings had been demolished (11 in the High Street) to make way for a growing population, increased road traffic and the town’s prominence as a commuter rail hub. The Society itself flagged up 160 buildings it deemed at risk.

The late Lord Onslow, in his role as The Society’s President, noted: ‘There is one thing that we must look out for. Planners have become too frightened of boldness in design. There are some wonderful old buildings and complexes in our town and it must be the object of all of us that what is built in the future lives up to the best of the past…We conserve a town as a living entity and not in aspic.’

Our present Constitution enshrines all these issues in its aims, which can be distilled down to our modern strapline: ‘Speaking up for Guildford’s Past, Present & Future.’

Today, The Society, numbering over 400 subscription-paying members, monitors all aspects of town (and sometimes, Borough) life through three principal Groups – Planning, Transport and Design & Heritage. These are manned by volunteers, most with appropriate professional and business experience, beneath an umbrella Executive Committee responsible for the overall direction and health of The Society. Members of the 12-strong Executive stand for election for a 3-year term at the AGM, and elect a chairman annually from amongst their number.

The Planning Group screens all planning applications, picking out and examining those it sees as meriting comment. Comment inevitably has to be lodged as an ‘objection’ as that is the way the public planning system works. On larger schemes there is often pre-application discussion with the developer.

The Transport Group monitors road, rail, cycle and pedestrian issues, involving debate with County Council and Highways authorities. There are various public consultation bodies, into which the Transport Group feed its views, often as an established member.

The Society is organised with four quasi professional groups of experienced volunteers with a wealth of relevant expertise (the Planning Group, the Transport Group, the Design & Heritage Group and the Local Economy Group) forming a combined ‘Knowledge’ Group.

This combined expertise has helped us to form an objective response to both the Society’s Reg18 Consultation and the Reg19 Consultation responses.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/272</th>
<th>Respondent: 8566497 / Derek Horne &amp; Associates Ltd (Derek Horne)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td></td>
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<tr>
<td>Answer:</td>
<td>(Yes)</td>
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</table>

PLEASE SEE ATTACHED.

Attached documents: 📄 GUILDFORD BOROUGH COUNCIL Submissions.docx (17 KB)

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<table>
<thead>
<tr>
<th>Comment ID: SQLP16/525</th>
<th>Respondent: 8567105 / David Calow</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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</tbody>
</table>
There is a suggestion of a road tunnel for through traffic. The entrance and exit points are not known, the route and full cost are not clear. It is not certain who would pay and how much risk indecision might bring. In principle, however, a road tunnel would reduce costs for everyone trying to get past Guildford and make it easier for Guildford to develop and should be supported.

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.
Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is my belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

Attached documents:
Applying Constraints

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

Attached documents:
Blackwell Farm and Gosden Hill are listed under Guildford Urban -- It should be noted that this is aspirational and is not current. It is misleading to list these greenbelt fields in this category. Those without an in depth knowledge of the plan may not realize that these are not currently urban sites.

Wisley is listed as a 'new settlement' a description that does not do justice to its size. Blackwell Farm and Gosden Hill are also new 'settlements' and should be listed as such rather than as 'urban extensions'.

The Draft Local Plan raises many other issues but time constraints preclude us from making further detailed comment. However we have been party to the carefully crafted response prepared by the Burpham Community Association (BCA) and viewed the extensive critique undertaken by the Burpham Neighbourhood Forum (BNF). We have also been given access to the extensive documents written by both the Merrow Residents Association (MRA) and the Campaign to Protect Rural England (CPRE). In conclusion we would wish to endorse the views, analysis and comment contained within the above replies that are being sent out to GBC. The scale of the draft Local Plan with its dense and difficult presentation makes it a daunting task for just one or two individuals to give a comprehensive response and where necessary rebuttal to many of the facets contained within this consultation. However it is apparent that much of what is proposed jars badly with the people of Guildford. Therefore essential the Council not just hears but listens carefully and make real improvements to the plan before irreparable damage is done to an historic town and its surrounding countryside.
In the last year there has been a seismic shift and concern by government at all levels as well as the public over roadside pollution. A decade ago it was just greenhouse gases. Today it is nitrogen dioxide and ultrafine particulate matter (PM2.5), emitted by car engines and thrown up by brakes and road wear, that is making the headlines. Thousands of people die each year as a result of breathing air that is officially considered safe. While WHO recommend a cap of 10 µg/m³ and the EU set legal limits at 25µg/m³, very low levels of air pollution can shorten lives while tiny changes equivalent to taking a few cars off each road could save many lives. What is being proposed by the local plan in Burpham and it environs does nothing to alleviate the existing threat of traffic pollution, congestion and gridlock. In fact it conspires to make the situation far worse. Intelligent local planning should recognise the consequences of such action and respond with a scheme that is not simply one of expediency at the expense of the electorate.

Villages do need new housing if they are to survive, renew and thrive. This should not be to the almost exclusive advantage of big developers and volume housebuilders who relish the prospect of putting estates on the green belt because of its favoured position and the ability to sell units at a thumping profit. This does not meet the community need for decent affordable housing. Such a situation seems to be planned for Gosden Hill. Here a residential mixed use development is to be built on an agricultural site that is predominantly Grade 2 and 3a farm land. However the Guildford Borough Transport Strategy 2017 document refers to the potential of an A3 Guildford Tunnel. Should this come about, Gosden Hill is an obvious choice to begin such a venture and this conflicts with the current proposals.

In conclusion we object strongly to Policy S2, Policy H1 and Policy A25 for the reasons set out above. The changes proposed have done nothing to mitigate the concerns expressed in our previous letter of 16/07/2016. The case for more houses of the right kind cannot be denied and suitable developments are quite possible as long as realistic targets are set and supported by local government. The current proposals are driven by an over inflated housing need figure and an inability to create the necessary infrastructure to deliver a sustainable quality of life for both existing and future residents. We can only trust that it is not too late and planners will consider carefully the concerns of local people who have on a daily basis to deal with the consequences of their actions.

Attached documents:

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Comment ID: SQLP16/2132  Respondent: 8573793 / Harry Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: (Yes)

See my letter dated 15/7/16

Attached documents:

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Comment ID: pslp17q/355  Respondent: 8574369 / Douglas French  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Answer: ()
Conclusions

8.1 In aggregate the above proposals combined with the ones we are not allowed to comment about, amount to excessive over-development in a small village.

8.2 I object to the mechanics of Regulation 19, restricting comments to new proposals only, as it is being applied by GBC. In the context of GBC’s proposals, where site allocations have been changed and then changed back again, sometimes at the last minute, there is a risk, of which GBC cannot be unaware, that an objection may be interpreted as a preference for what was proposed before. It is almost as if some of the changes have been designed to garner positive feedback and skew the numbers. The Inspector will no doubt be alert to this risk.

8.3 The proposals as they stand are intended to be a draft local plan for the whole of Guildford Borough. It is very disconcerting therefore that somewhere around 40% of the development is contained within a geographical area of about 11% of the borough, all within less than five miles of Send village.

8.4 It is also disconcerting that in addition to the 8 travelling show people plots, Send has also been allocated 2 traveller pitches, the only village in this position.

8.5 This looks like unjustified, unfair and unreasonable concentration in one area to the benefit of other areas which are escaping almost completely. One can only speculate as to the reasons underlying this bias. The Inspector will no doubt wish to make his own enquiries as to the reasons for the imbalance, although one does not have to look very far to find them.

Attached documents:

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<tr>
<th>Comment ID: SLP16/966</th>
<th>Respondent: 8575585 / Ian Macpherson</th>
<th>Agent:</th>
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<th>Comment ID: SLP16/384</th>
<th>Respondent: 8581921 / Joan Garcia</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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The traffic problems raised by those of us who responded to the previous consultation have been insufficiently addressed. You have made proposals for major road changes, and some new park and ride facilities. However, the volume of traffic is already problematic, and for those of us who live in the villages surrounding Guildford, I see no proposals for improvement. In Chilworth, the main road running through the village is used as a 'Guildford by-pass' by large volumes
of vehicles daily, and I do not see how this will be improved. It is extremely difficult to get out of Chilworth village in
the mornings and other busy periods, due to traffic heading into Guildford from the Wonersh directions, and in the
evenings due to traffic in the other direction.

More widely outside my own village, the traffic in the roads around Guildford is very heavy, and quality of life does not
appear to have been considered in proposing large amounts of new homes in the area. This has all been said before, and
apparently ignored.

I do not believe that proposals cater only for housing requirements in the area, but for people wanting to move into the
area. The more houses that are built, the more people will move into the area, from London in particular.

I, and many others, commented in the last consultation against proposals to inset (i.e. remove) some villages from the
Green Belt. These comments have been ignored, and the new document still shows a list of villages (including Chilworth)
which be removed. In Chilworth, the eastern half of the village has an open character which surely 'contributes to the
openness of the Green Belt'. It has views up to St Martha's Hill and to the Heathland on the southern side of the main
road running through the village. I strongly object to proposals to remove this village from the Green Belt. The proposal
would no doubt then offer opportunities for future building on the northern side of the main road, adding to ever
increasing traffic, and consequent noise, and further spoiling the quality of life here.

Attached documents:

Comment ID: SQLP16/385  Respondent: 8581921 / Joan Garcia  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: (Yes)

I, and many others, protested in the last consultation against your proposal to remove some of the villages from the Green
Belt. This included Chilworth, where I live. Our views have been ignored, and still you plan to go ahead with this
proposal. Our village sits within the Green belt, and the eastern half of it has an open character, with buildings on only
one side of the road. It also sits within the Surrey Hills AONB. It has open views up to St Martha's Hill, and opens out
onto heathland on the southern side of the main road. wish to protest again that removal of the village from the Green
Belt, as this will clearly open up the possibility of further construction within its boundaries. This would lessen its open
aspect, and would give rise to further traffic, congestion and noise. You do not appear to have had any regard to the
quality of life experienced by residents within Chilworth and similar villages.

Attached documents:

Comment ID: pslp17q/248  Respondent: 8586017 / Leslie Brown  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Answer: ()

GENERAL OBSERVATIONS
Whilst so much of what the Council does on behalf of the community is taken for granted, probably with very little
expression of gratitude, I personally am much more
critical of the Local Plan proposals. We in Send have expressed our views over the years but clearly no attention is paid
to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in
Send than before plus an additional eight Show people pitches.
The opening paragraph to the local plan states "Our Proposed Submission Local Plan balances the needs of residents, businesses and visitors with protecting the borough's most important countryside, landscapes and heritage. It addresses housing, employment, retail and leisure requirements, supported by suitable infrastructure including education, healthcare and transport. The new Local Plan will be in place until 2034."

Furthermore there are signs at various points proclaiming "The Surrey Hills an area of Outstanding Natural Beauty." Yet despite this the Local Plan will considerably increase traffic volumes, transform existing villages into small towns, reduce the benefit of the Green Belt, result in undesirable ribbon development and increase demand for education and health services which are already trying to cope. The scale of the plan is such that it will inevitably diminish these claims. I regret to say that I remain disappointed in the Council's objectives and total disregard of public opinion which have consistently been expressed at meetings and in letters of objection by residents deeply concerned with their environment and way of life. I would like to feel that GBC are more in tune with those they represent but I am sorry to say I do not.

*Attached documents:*

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**Comment ID:** SQLP16/1617  **Respondent:** 8591169 / Michael Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**QUESTIONNAIRE Q7**

1. The Plan has changed very little since the 2014 Draft Local Plan which received 20,000+ objections. The Council has wearied objectors this time by ignoring objections in 2014. It is a natural human condition to 'give up' against GBC's apparent wall of deafness to reasoned objections?

*Attached documents:*

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**Comment ID:** pslp17q/62  **Respondent:** 8593185 / Niels Laub  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** (Yes)

There should be a firm requirement for all future residential development to be concentrated in existing urban areas or settlements before any development is allowed within the green belt. For example there should be a much greater allowance for housing in the North Street Development and an appropriate amount of housing assigned to the Telephone Exchange site which currently has none. Moreover, no development should be allowed on any of the Strategic Sites in the green belt until improvements to the A3 and all supporting infrastructure is in place.

Because, once the Local Plan has been adopted, the council will be tied to a commitment to deliver a certain amount of housing within a stated period of time, the council should consider introducing penalties for developers who leave urban areas derelict, or buildings unoccupied, for long periods of time.

*Attached documents:*
<table>
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<tr>
<th>Comment ID: SQLP16/1343</th>
<th>Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke)</th>
<th>Agent:</th>
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<td>See attached letter</td>
<td>Attached documents:</td>
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<th>Respondent: 8595649 / Paul Kassell</th>
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<td>Monitoring of policies is ineffective and often doesn’t address the objectives of the policy. Examples would be, no measure of the percentage of students housed on campus, no visitor surveys of SPA etc.</td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: pslp17q/257</th>
<th>Respondent: 8598561 / Sarah Belton</th>
<th>Agent:</th>
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<td>As Britain prepares to leave the EU, it is entirely possible that the population, especially in the home counties like Surrey, may see a reduction as some EU nationals return home, thus relieving some of the perceived need for increased housing. The Local Plan needs to take this into account. Developers avoid brown-field sites as the cost of development can be higher, resulting in a lower rate of return, while green-belt land is cheap to both purchase and develop to maximise profit. There are many brown-field sites in the Borough, and it must be mandatory to develop these before any other sites are even considered. I will be accused of not wanting development in my own back yard, but my concerns are more far reaching than my local area, I believe the south east of England is at capacity. and I want to see vision and innovation in development practice for the future good of Britain as a whole. Our elected representatives at all levels must conduct themselves with due diligence and integrity, for the long term future of all, including their own children, not for the short term profit of a few.</td>
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<th>Agent: Associate Vail Williams (Chris Wilmhurst)</th>
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Paragraph 4.3.13 and Inset Plan for West Horsley (south)

The Insetting of the villages as set out in Paragraph 4.3.13 and as identified on the Inset Plan for West Horsley is fully supported for the following reasons:

1. Guidance in the NPPF (paragraph 86) makes it clear that villages should only be included within the Green Belt in circumstances where the open character of the village makes a contribution to the openness of the Green Belt. Since there are many villages within the Borough where this does not apply, it is right and proper that as part of the evidence base for the Local Plan, each of the villages should be appraised for the contribution that they make to maintaining the objectives of Green Belt. Accordingly, the Green Belt and Countryside Study relating to the insetting of villages is supported in general terms.

2. More specifically, the assessment and conclusions of the Green Belt and Countryside Study in respect of West Horsley (South) are supported. This concluded that the village should be inset with the Green Belt. As noted in the study, the majority of the village is considered to exhibit an enclosed character due to tree cover and topography surrounding the village; areas of open land within the wider Green Belt are not frequently visible within or beyond the perceived village area and it is generally contained by a number of recognisable and defensible boundaries that would permit the provision of new Green Belt boundaries, as shown on the Stage 2 Map. This analysis is correct and, as such, the conclusion that the village should inset into the Green Belt is supported.

3. Guidance in the NPPF (paragraph 85) deals with defining boundaries and advises local planning authorities that they should be clear, using physical features that are readily recognisable and likely to be permanent. The preparation of the Local Plan provides an opportunity for the existing defined boundary of the settlement to be reviewed. It is considered that this is necessary due to existing inconsistencies in the way that the 2003 Settlement Boundary is drawn and the need for the new defined settlement boundary to accord with the proposed new status of the village as being Inset within the Green Belt.

4. For the above reasons, the identification of a defined boundary for specified villages in which appropriate development or redevelopment will be allowed is fully supported. In particular, the inclusion of West Horsley (South) as one of these settlements is supported. For the same reasons, the Horsley Plan showing the proposed Settlement Boundary is also supported.

Attached documents:
1. In our response to the July 2016 Submission Local Plan we expressed concern in Section 1 of our response that the OAN, following the Brexit vote, needed to be re-assessed and GBC duly did so. We note the resultant decrease in the OAN but we continue to question whether the revised number is appropriate as the Brexit negotiations for the UK's exit from the EU are still at a very early stage and the impact on UK economic growth and net international immigration is totally uncertain. We note the phased implementation of the housing units but believe that the OAN should be re-evaluated after the Brexit negotiations are complete and our economic future is a little more predictable.

2. Para 2.13. This states that "facilities to assist pedestrians in crossing roads are commonplace". Whilst it is difficult to argue with this statement we feel that they are insufficient and further crossings are certainly required in this parish on the A 248 and the A 281 for the use of both young and elderly residents. We also believe that changes in speed limits through the villages make it difficult for all road users to travel safely.

Rather than respond to the 20,000 objections to the previous draft, GBC has taken the easy route of trotting out the previous plan, almost unchanged, apart from an increase in the OAN, for some explained reason. They have spent a fortune on PR consultants to plug their achievements, whereas they should have gone back to the drawing board, and started from scratch.

The constraints, which are required to be applied, under the NPPF, such as the purpose of the greenbelt have not been applied.

The GBC Tory party promised in its 2015 election manifesto to protect the greenbelt, and yet this plan proposes the wholesale destruction of the greenbelt.

There is little or no proposed solution to improving the infrastructure, which is already under strain.

This plan is not fit for purpose.
This Plan was drawn up before the June 23 EU Referendum vote and the public's decision that the UK should leave the EU. This has such a material impact on the assumptions underpinning the Plan that it should now be revisited.

Attached documents:

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I will outline the remainder of my comments in a letter

Attached documents:

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Maps change frequently. First you see ancient woodland then with the next draft you don't. Maps are using old data and do not reflect the true nature of places. The whole thing's been a mess since they started.

Attached documents:

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OBJECT To building anything on Greenbelt, AGLV or AONB sites. It should be protected as per election promises from Local and Central Government.

OBJECT to amount, or lack of, homes planned for the town.

OBJECT to SHMA figure of 693, Guildford is promoted as a growth town and this plan does not reflect Local Need. Further independent scrutiny of the base line data shows that this document is seriously flawed. GBC insists it is right but they havent seen the calculations.
OBJECT to the proposals for more employment space as guildford already has a very high employment rate. We also have a range of buildings which are empty.

OBJECT to huge retail expansion in Guildford. These places should be reserved for homes. Guildford already has ample retail space, some of which are still empty. Our local businesses will be unable to compete with big retailers and will be forced to close.

OBJECT to the current lack of infrastructure. Guildford is gridlocked, no one seems to do anything about it. We can't get to the station, it takes longer to drive 2.4 miles from the station as it does to get a train from Waterloo to Guildford. More people will make this journey ridiculous.

Attached documents:

Comment ID: SQLP16/590  Respondent: 8729313 / Lisa Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

I object to Greenbelt being created in Ash and Tongham to the detriment of another site elsewhere.

Attached documents:

Comment ID: SQLP16/1763  Respondent: 8729313 / Lisa Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

In addition to my online comments.

I would like to object at the way Guildford Borough Council consulted Worpleesdon Borough Council and neighbouring councils on the Local Plan. They had one meeting with us in three years at which they promised that in Worpleesdon 'we would be pleased'. They showed us a map of all the sites, without labels.

They then showed neighbouring parish councils different maps and gave different views of the same plan.

It seemed different maps and explanations were given to every Parish Council across Guildford. The whole thing was just a tick box exercise.

Furthermore, as a Parish Councillor, we were warned that if the current Local Plan sites didn't go forward for approval, other sites, e.g Fairlands safeguarded land would come back in the plan. This I took as a direct threat, knowing that the residents of Fairlands had previously objected to their safeguarded land for a multitude of reasons and had it removed from this consultation.

Therefore, I must object to the lack of openness, honesty and transparency Guildford Borough Council has given to its residents and Councillors during this consultation.
| Comment ID: SQLP16/1163 | Respondent: 8749089 / Anthony Hatton | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? |
| Answer: () |

My wife and I have been residents of Guildford for over 25 years and in a variety of ways involved with local community activities. In this regard my wife was a founder Board Member of Abbotswood Residents Association and we have both maintained a keen interest in local developments particularly with regards to the "Local Pan." Whilst our comments as appended below represent our joint views, it is worth emphasising here that to a great extent these have been shaped by the views and submissions made at various stages by the GRA and Guildford Society and residents who have been deeply involved in the community and its future for a significant amount of time and who are well versed in the subject matter.

Along with other residents with whom we have discussed the issues, we have regrettably come to the view that the standard of scrutiny applied to the Local Plan falls significantly short of the rigour which would be applied in the corporate sector and other large private and public entities. Clearly, the development of a a Local Plan for Guildford is of paramount importance, Equally, having one in place as soon as possible is essential if Guildford is to avoid inappropriate local development of which there are numerous examples.

| Attached documents: |

| Comment ID: SQLP16/472 | Respondent: 8749121 / George Paton | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? |
| Answer: (Yes) |

The propaganda video on the GBC website promoting the local plan is a disgrace. It would never pass any test of impartiality. It is flagrantly biased. Like the local plan the video is a developer's charter.

The Green Belt and Countryside Study is likewise completely unprofessional. The evidence base is a collection of consultants' reports many of which the Council has never scrutinised. The supporting models in many of these reports - eg the SHMA and Transport Assessment have not even been properly appraised by council officials.

The conduct of the local plan has been directed to serve the narrow interests of the Executive of the Council which has extraordinarily proposed a new Green Belt in Ash whilst destroying Green Belt elsewhere.

| Attached documents: |

| Comment ID: SQLP16/74 | Respondent: 8766945 / Liz Machtynger | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? |
| Answer: () |
Please let us leave a green and pleasant legacy for our children. I strongly believe that in addressing the basis for the plan and identifying brownfield sites as well as business opportunities and transport opportunities this plan could be one that most could feel would deliver this.

Attached documents:

**Comment ID:** SQLP16/1620  **Respondent:** 8803713 / Ian Berry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I am so tempted to have a rant about GBC’s incompetence to come up with a proper holistic plan to cope with the increased requirement for homes. But it wouldn’t be fair on the poor souls who has to read these letters and collate the info.

Attached documents:

**Comment ID:** SQLP16/115  **Respondent:** 8804929 / Helen Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I am disappointed that, despite the many objections to your plans, you STILL continue to ignore the overwhelming feedback from local residents. It is us, the current residents, who will have to live alongside these new developments and put up with the vast increase in local traffic and demand for public transport, schools, medical facilities and parking, etc.

Your plans will have a HUGELY negative impact on our day-to-day lives.

I trust that you will finally listen and review your plans substantially.

Attached documents:

**Comment ID:** pslp17q/280  **Respondent:** 8805633 / Alena Thomas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

I am writing to object in the strongest possible terms to the latest draft of the Guildford Borough Council Local Plan - as I have written to object to previous drafts, apparently with no effect other than to redouble the Council’s determination to dump punitive and badly thought-through levels of proposed development on our village.

The Council’s approach to the process of consultation is deeply cynical. Rather than responding to the legitimate
opposition of local residents to the disproportionate share of development allocated to Send in the first Draft Plan, subsequent drafts have added insult to injury, apparently taking the view that far from having a democratically enshrined right to have their voice heard on decisions with a potentially devastating effect on the future of their community, residents are being a damned nuisance by not letting GBC and their developer friends build whatever, whenever and wherever they like.

The plan as it relates to Send is flawed on three levels:

- the calculation of housing requirement for the Borough as a whole is extremely spurious, based on wrong assumptions about industrial demand, classification of university students and the indiscriminate imposition of national-level requirements on individual regions

- the share of the burden of development to be placed on Send and its environs has been from the first draft suggestive of a very poor attitude to complying with the demands of government. Rather than ‘how can we spread this requirement fairly across the Borough’, the Council appear to be asking ‘which few parishes can we sacrifice in the interests of keeping the others relatively happy’. More important in my view, the Council’s disregard for the Green Belt has been shocking: the Act requires ‘exceptional circumstances’ for areas to be removed from the Belt, while the current justifications for development are the most unexceptional imaginable - ongoing pressure of population and increasing demand for housing. This is exactly what previous governments committed not to doing.

In spite of this, we see the Plan focusing on new build in areas such as Send, Ripley and Wisley where it’s easy and cheap to carve up the countryside, rather than making a serious attempt to use the Borough’s extensive brownfield capacity to cover a high proportion of the development. The official line seems to be to talk about affordable housing and insinuate that those objecting are NIMBYs: but given the choice of sites (highly unpopular but the most profitable for development) and the decision to make a minimum of only 40 percent of houses built on land freed up for development ‘affordable’ (equivalent to perhaps 25 percent of the land thus freed up) - leaving developers rubbing their hands over the other 75 percent, it’s hard to keep faith in the Council's having any other motive than greed.

- most specifically, the effect on Send of the proposed developments will be to cripple the already creaking road system, massively overload schools and medical facilities, undermine the environment and - in short - ruin the village. It’s far from perfect at the moment but I can say hand on heart that it’s quite a nice place to live. It seems likely to be a truly grim place to live if the current Plan goes through.

It’s the third of these I want to focus on for the remainder of this email, and as instructed I shall focus on changes made since the previous draft - but please note none of the objections raised previously have been addressed and you should still give these full consideration.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/502</th>
<th>Respondent: 8806849 / Roland McKinney</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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The quality of this plan does not approach the quality of the 2003 plan. It is very sad that Guildford Borough Council's planning has been reduced to such a low level, especially when a template of a good plan was readily available.

Many Councillors demonstrate no real understanding of the issues and there is an astonishing level of turnover of officers who are involved in producing or are responsible for producing the plan. Despite having a very large planning department, GBC use consultants to produce evidence base documents, and there is no proper scrutiny of these documents when they are produced, either by officers or Councillors. This must create confusion in producing the
various iterations of the local plan, and a high level of confusion is evident in the text, which if anything, is even worse than the previous iteration.

Anyone concerned with producing it should hang their heads in shame at the untruths and distortions that surround it, for example, "we will protect the green belt" - "we will only use 1.6% of green belt for housing" - when the truth is that there is no protection for the green belt, with more than 6% of land to be taken out of the green belt.

Attached documents:

---

**Comment ID:** SQLP16/890  **Respondent:** 8810113 / Louise Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

Attached documents:

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**Comment ID:** SQLP16/724  **Respondent:** 8817601 / A. L Thain  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

1. A new larger replacement school for the Raleigh should be constructed on the site (built and paid for by the developers) and the old Raleigh school can then be demolished and replaced by new housing.
2. The site would have the main road entrance via a new roundabout constructed in East Lane.
3. To reduce traffic congestion a pedestrian tunnel should be built under the railway line embankment opposite the Horsley Surgery. This will enable safe, easy access to shops, railway station, doctors and East Horsley village hall. It will also allow residence of East Horsley a safe pedestrian route to the new school which would also reduce traffic.
4. By having just one large site this will also make the provision of utility services easier, which will reduce the number of surrounding roads that will have to be dug up to provide new sewers, ducts and cables to be laid as most of the existing infrastructure cannot cope with such a large increase in demand. It will also contain all construction traffic to one site accessed off the main village road thereby reducing disruption.

Limited development of a very small number of individual houses on sensible sites around the village can still be allowed to enable the village to evolve slowly over time.

Attached documents:

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**Comment ID:** pslp17q/179  **Respondent:** 8824833 / Stephen Stuart-Matthews  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** (Yes)

The population of Guildford will not grow 15% by 2034 (see my comments on the Evidence Base). The population is likely to grow less than half this amount as the number of international students migrating into and settling in Guildford declines in line with the revised government policies following BREXIT. Therefore assuming government migration targets are even just partially met only 2500 to 7500 new houses will be required over the next 15 years. It is therefore not necessary to build circa 12500 new homes in the Guildford Borough over the next 15 or so years and the required new stock can be build without encroaching on existing Green Belt land.

I now therefore object to all new housing sites set out within the report that are on land currently designated as Green Belt. I particularly now object to proposal for 2000 homes on Wisley Airfield and to removing much of East and West Horsley from the Green Belt. This scale of encroachment onto the Green Belt would be wholly disproportionate to the true need.

**Attached documents:**

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<tr>
<th>Comment ID: SQLP16/1884</th>
<th>Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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**Chapter 3 - Our Vision and Ambition**

The Local Plan should not go forward for public examination when we do not have a town centre masterplan. It is axiomatic that a significant level of new housing could and should take place in the town centre on brown field sites.

So far as the town centre is concerned too much retail space has been identified for development when the amount of retail space required in the town centre, as in all other town centres, is diminishing over time. The plan lacks any assessment of retail trends and a strategy for delivery simply proposing that there should an increase by 40% in retail space. It is unacceptable and a waste of space for such a large percentage of the town centre to be allocated for retail use. Some of this land should be used for housing and not for retail. We do not wish to see the reputation of Guildford's shops being diminished in any way but a quick walk round the town centre would indicate just how many shops are empty. This trend is likely to accelerate.

**Attached documents:**

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<tr>
<th>Comment ID: SQLP16/1211</th>
<th>Respondent: 8825377 / Jane MacIntyre</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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The draft plan must be withdrawn and replaced by a transparent plan based on sustainability and national planning guidelines. There must be no building on precious Green Belt land. As detailed in my response to the previous draft plan, green spaces are now widely held to be important for physical and mental well being.

People feel very strongly about this.
It is disappointing that comments made on the 2016 consultation are largely ignored. Indeed the summary of the changes made states that 'most changes are relatively minor that do not alter the intention of the policy’. If the consultation is to be meaningful, then the comments received should be considered and not just ignored.
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. It is obvious that residents of rural villages have made a choice to live in a rural, rather than semi-urban setting, and it is thus far preferable to plan large housing developments in areas that are already urban or semi-urban. Most residents of these villages understand and accept the need for some degree of housing development, but it must remain proportionate to the size of those villages, so that they can maintain their character, and the local infrastructure does not become overwhelmed.

Attached documents:

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Guildford Borough Council: Guildford Borough Proposed Submission Local Plan: Strategy and Sites

Representation by Solum Regeneration (Guildford) LLP

Nathaniel Lichfield & Partners (NLP) has been instructed by Solum Regeneration (Guildford) LLP (SRG) to review the above consultation and submit representations on SRG's behalf.

Solum Regeneration in Guildford

Established in July 2008, Solum Regeneration (SR) is a partnership between Network Rail and Kier Property, formed to attract private investment into the rail network. SRG has been formed specifically by SR to deliver the Guildford Station project.

NLP submitted a planning application (Ref: 14/P/02168) on behalf of SRG for the comprehensive mixed use redevelopment of Guildford Station, including significant station improvements, public realm and new homes, in November 2014. Following subsequent extensive consultation and engagement with Guildford Borough Council (GBC), statutory bodies and local groups, revised scheme proposals were submitted to GBC in November 2015.

The SRG planning application was refused planning permission at the GBC Planning Committee on 29th June 2016, principally on heritage and design grounds. SRG is currently considering options for progressing development at the Guildford Station site. SRG remains an important stakeholder in the town centre intent on delivering improvements to Guildford Railway Station (a 'gateway' to the town and a key component of its infrastructure) through the delivery of much needed new housing at this highly sustainable brownfield location.

Representations were previously submitted on behalf of SR in relation to the Guildford Borough Local Plan Strategy and Sites: Issues and Options (2013) and the Draft Guildford Local Plan: Strategy and Sites (July 2014). Further representations are now submitted on the site allocation and other policies and allocations in the Proposed Submission Local Plan, June 2016.

Scope of Representations

We make comments on the following parts of the draft Local Plan:

- Spatial Vision (pages 19 - 21);
- Policy S2: Borough Wide Strategy (pages 26 - 27);
- Policy H1: Homes for All (pages 31 - 32);
- Policy H2: Affordable Homes (pages 38 -39);
- Policy E7: Guildford Town Centre (pages 84 - 85);
- Policy D3: Historic Environment (page 103);
- Policy 11: Infrastructure and Delivery (pages 108 - 110); and
- Policy A7: Land and Buildings at Guildford Railway Station (pages 140 - 142).

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1025</th>
<th>Respondent: 8836545 / Marian Sage</th>
<th>Agent:</th>
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In General

I could go on - GBC has not applied any constraints in reducing housing numbers as other council’s in Surrey have. It seems the Strategic Housing Market Assessment (SHMA), cannot be trusted and the large fluctuating student population distorts the figures anyway. The Office for National Statistics (ONS) downgraded Guildford’s population growth. The unnecessarily large projected increase in retail space when there are already empty shop units. Are brownfield sites being utilised to the full. House more students on the university campus, freeing up houses within Guildford. Tourism and use of the countryside by local people for all sorts of recreational activities is being ignored in favour of development and in the process indirectly and irreparably affecting areas it purports to protect, ie The North Downs, Hog’s Back AONBs, SSSIs the THBSPA etc.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/514</th>
<th>Respondent: 8838209 / E O Wiejska</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
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I still do not agree with the very limited changes made to the local plan dated March 17 and object to it strongly based on my original comments as on file with you.

Attached documents:

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<th>Comment ID: SQLP16/1798</th>
<th>Respondent: 8839041 / Jon Maslin</th>
<th>Agent:</th>
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<td>Document:</td>
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Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents’ groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a
great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of ‘double speak’ has led to absurdities such as ‘affordable housing’ which is over £300,000 i.e. ten times the average salary; ‘safeguarding’ which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

‘About ancient woodlands, of course they are very attractive things, but they are ancient and trees don’t last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life’

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

**Attached documents:**
Finally, I would like to object to the restrictions imposed by GBC on the type of responses to the 2017 Local Plan that they would accept. Only accepting comments on the changes to the previous plan, rather than all elements of the current plan is overly bureaucratic and absurd. It has created very high barriers to making comments about the plan (having to go back and forth between the hundreds of pages of two versions of local plan) and also ignores the objections that residents may have to existing parts of the plan which have not seen changes. For example, Policy A44, Land west of Winds Ridge and Send Hill, was added to the last version of the plan and had received many objections, which should still be valid for this plan. There has also been a lack of transparency about the evidence base for housing figures and how much influence property developers have had on the inclusion of different sites within the plan.

The 2017 Local Plan shows a lack of consideration for local residents’ opinions, is based on excessively inflated housing needs numbers and does not take into account the capacity of infrastructure such as roads, schools and medical facilities to support proposed developments, or the implications for increased pollution caused by proposed developments. This shows very poor planning practice and contempt for existing residents. It is as flawed as previous versions and not fit for purpose.

Attached documents:
I wish to raise the following objections to the draft local plan as circulated.

Re Stated Objectives number 6, I object to the exclusion of ANSNGs (Accessible Natural and Semi Natural Greenspace) from the list of designated areas to be protected. Guildford BC is responsible for a number of these sites.

Further to my comments below, I wish to object also to the failure under recreation and countryside policies to note the need for maintenance and extension of Rights of Way, especially given the deadline for registration of 2026.

Attached documents:

Comment ID: SQLP16/1807  Respondent: 8850689 / J Reardon Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I wish this e-mail to be lodged as an OBJECTION to the Local Plan. I would also respectfully request that I am kept informed of developments regarding the Local Plan. However, under the Data Protection act, I would ask that my name and contact details are not divulged.

Attached documents:

Comment ID: SQLP16/1015  Respondent: 8850977 / Sam Pinder  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I opposed the Local Plan during the 2014 consultation, which Guildford Borough Council withdrew due to the enormous opposition that they received to this. You said you had listened to the over 20,000 mostly negative comments, but you have produced something that is very similar to the first version and you have ignored the wishes and comments of many of the people that live in the borough. More worryingly, you have not kept your election promises to protect the Green Belt. Consequently I feel let down by the lack of integrity that my elected representatives have shown and hope that you will realise the mistakes that you are making – once you have built all over the Green Belt you cannot bring it back.

Attached documents:

Comment ID: SQLP16/981  Respondent: 8853025 / Charles Gibson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

1. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. There is certainly no local need in Send to expand the village by over 25% which it would with the proposal to
build an additional 485 houses in the village. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially from the previous draft local plan.

Attached documents:

Comment ID: SQLP16/1856  Respondent: 8853025 / Charles Gibson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. There is certainly no local need in Send to expand the village by over 25% which it would with the proposal to build an additional 485 houses in the village. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially from the previous draft local plan.

Attached documents:

Comment ID: SQLP16/1622  Respondent: 8854785 / Desmond McCann  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

Attached documents:

Comment ID: pslp17q/122  Respondent: 8854785 / Desmond McCann  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Answer: ()

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.

Attached documents:
Comment ID: SQLP16/363  Respondent:  8858017 / Adam Scott  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  

Answer: (Yes)  

I am concerned about the proposed sites a29,a30,a28,a31,a54,a46 as almost all are on green fields and in an area that has already had more than its share of development. Ash and Ash vale stations lack enough parking and this needs to be improved. Much of the proposed sites are prone to flooding and this breaches national planning regs. The transport links from this area are also poor partly due to the lack of a station in surrey business park and lack of a 3rd lane on the a3 from the a31 though surrey business park. There also needs to be a bridge built over the ash level crossing and I suggest a park and ride/ glide is built on the edge of the a31 connecting to the existing train lines  

Attached documents: 

Comment ID: SQLP16/1324  Respondent:  8864161 / Phyllis Kirkland  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  

Answer: ()  

It appears that you intend to use what is currently agricultural fields. This is so wrong. Apart from the animals like sheep who already come there yearly and the grass that is cut so that the animals have hay you will also be destroying, yet again, the homes and general living places for wild animals. That is so unfair.  

Please reconsider your ideas and don't just think in terms of how much more money you can get.  

Attached documents: 

Comment ID: SQLP16/486  Respondent:  8864993 / H. Earl  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  

Answer: (Yes)  

Guildford is already much too big and the large-scale extra housing will be counter-productive, as the lack of capacity for traffic movement, uncertain infrastructure and loss of landscape will deter people from wanting to live in the proposed excessive developments. Our councillors should fight the apparent national obligation to spoil our town and its surroundings. Guildford has increased its population enough.  

Attached documents: 

Comment ID: SQLP16/1290  Respondent:  8880225 / Jennifer Rankin  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? 


You in the County and Borough Councils are in existence to represent the needs and wishes of us your voters. I would respectfully request that you do this and not try to foist upon us these developments within and around our precious Surrey villages.

Attached documents:

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**Comment ID:** SLP16/1058  **Respondent:** 8882689 / Jane Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I am saddened that year after year the residents of West Horsley are forced to defend their village following unjustified proposals being made by consultants and planners with seemingly no connection to the villages or knowledge of the local areas.

I trust you will take each of my points into consideration

Attached documents:

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**Comment ID:** pslp17q/218  **Respondent:** 8890753 / Jan Messinger  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

I object to the proposed Keens lane developement on the grounds of no infrastructure and the very narrow road with grade 2 listed building in it which would not be suitable for the increased amount of traffic with such a development.

I object to the inclusion of Blackwell farm as a development site. Policy A26 &paragraph. 4.1.9 which disregards an independant expert landscape study, of which demonstrates that part of the site merits Area of Outstanding Natural Beauty.

Ignores independant expert traffic studies which show the impact of development at Blackwell farm on the local network which already cannot cope with the traffic.

Adds air pollution to neighbouring areas.

The increase surface water would effect the Parish of Worplesdon.

My personal objections to the proposed local plan consultation period June 2017-24th July 2017 are the same as submitted by Worplesdon Parish council.

Attached documents:
OBJECTIONS to the Guildford Borough Council Submission Local Plan

I am aware that Guildford Borough Council (GBC) have put a lot of effort into this Submission and I thank them for it. I do not want to participate in an Examination.

Contents

SOUNDNESS page 1

EVIDENCE BASE

• Objection to GBC’s Transport Strategy page 3
• Objection to housing figures in the SHMA page 4
• Objection the Settlement Hierarchy and Settlement Profiles page 4
• Objection to the lack of a Heritage Strategy page 5

INDIVIDUAL POLICIES OF THE PLAN

• Objection to policy P2 insetting of Normandy and Flexford page 5
• Objection to Policy P2 GBC Submission 4.3.17 page 5
• Objection to Policy D4 page 5
• Objection to Policy A6 increased retail space in Central Guildford page 6
• Objection to Policy A22 land North of Keen's Lane page 6
• Objection to Policy A26 Blackwell Farm page 6
• Objection to Policy A46 Normandy/Flexford strategic site page 7
• Objection to Policy A47 Land to the East of the Paddocks, Flexford page 12

SUMMARY page 13

ANNEX A page 13

ANNEX B page 14

ANNEX C page 16

Attached documents:

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4. The Local Plan (and its latest changes) has been constructed on the basis of housing numbers which, as far as I'm aware, have not been made available for public scrutiny. Without such scrutiny of the projected housing numbers the Local Plan can have no validity.

Attached documents:
Think again if you wish to retain your council seat. You will not be voted for again.

Attached documents:

I AM STRONGLY OPPOSED TO THE ABOVE AND RESPECTFULLY REQUEST GUILDFORD BOROUGH COUNCIL PLANNING COMMITTEE TO RE-CONSIDER THIS IN THE LIGHT OF ALL THE VALID ARGUMENTS THAT HAVE BEEN PUT BEFORE THEM.

Attached documents:

I appreciate that the Council is under pressure from developers and central government to permit development (themselves having failed to curtail immigration or population growth!), but as the referendum on 23rd June made clear, the wishes of the people of the UK will be heard for we are very angry indeed at these proposals.

Attached documents:

I am able to list many other points but I doubt whether it will get me anywhere especially as I believe that the Scrutiny Committee is blocked from scrutinising the Pre-Brexit out of the public domain recommendations that the council have been given.
The proposed Local Plan has been drawn by people who are working from maps in offices and who have no little or no knowledge of the local areas or their residents.

I hope that common sense will prevail.

Representations attached:

**Attached documents:**
- [LP2016 Letter of Objection to GBC's Proposed Submission Local Plan (published 6 June 2016).](#)

GENERAL OBSERVATIONS

The latest proposed plan is considerably worse than the previous plan and I am very disappointed in GBC and I am much more critical of the Local Plan proposals.

As residents of Send Marsh, we share the same views of that of our neighbours in Send and Ripley. Every time we are asked for our opinion we make it very clear by way of a massive response that so many of the proposals are ill conceived and impractical to apply in our particular area.

GBC seems to be either unwilling or unable to act upon the feedback and opinion which is so clearly voiced by the residents.
We in Send Marsh have repeatedly expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before plus an additional eight Show people pitches.

The Conservative Manifesto for GBC states:

“Deliver a new Draft Local Plan taking into account constraints, residents’ views and protecting the green belt”.

It would appear that for the villages of Send, Send Marsh and Ripley, GBC are failing on two of these:

**Failing to take into account residents’ views**

and

**Failing to protect the green belt.**

Lessons from the previous plans have clearly not been learnt and one has to question the logic of the proposers thinking and how completely unsupported and illogical plans can have reached this stage. One also has to question whether anyone from GBC has ever driven or walked around Send and Send Marsh as one journey, particularly during rush hour would have demonstrated how ridiculous and unreasonable these plans are.

In conclusion, the continual disregard of local public opinion is very disappointing and GBC needs to create a significantly better plan than this one for the area we live in.

**Attached documents:**

---

**Comment ID:** pslp17q/291  **Respondent:** 8924161 / Peter & Victoria Luckham-Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

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 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 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.

**Attached documents:**
I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

Attached documents:

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(1) Although I understand the aim for more sustainable modes of transport in the centre of the town, there are several matters that affect those who live close to the town centre.

Some residents are not able to walk to and from the town centre, particularly if this involves going up a steep hill. Many of these areas are not served by bus routes. Cycling is not a possibility and taxis are expensive.

Regarding the suggestion for a sustainable movement corridor (a priority route for buses, pedestrians and cyclists) through the Guildford Urban area - it would make it very difficult for residents of central Guildford to get easily from one part of Guildford to another if they were not allowed to use a car along this proposed route, especially those people living at the top of steep hills, those who are elderly or have walking difficulties (not necessarily bad enough to warrant having Blue Badges) or those who have young children.

Those of us who live close to the town centre often need to go through the centre by car if we are planning to travel anywhere away from Guildford. Also, to go from, say, the Pewley Hill area to, say, Guildford Main Line Station is a fairly short route through the town centre. However, if we had to drive several miles along roads outside the town centre to reach the station, it would be wasteful of resources (e.g. petrol) and cause more pollution.

(2) I support the plan to build two new railway stations - Guildford West Railway Station and Guildford East Railway Station. (If there were any way of reopening the railway line between Guildford and Cranleigh, that would be excellent.)

Attached documents:

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Woking B.C.Site in Upshott lane 400 houses has significant implications for Ripley as it will funnel traffic into the Newark Lane bottle neck.

Attached documents:
Comment ID: pslp17q/18  Respondent: 8933185 / Peter See  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: (Yes)

Pages 3,4 Contents

You have about 13 lines where you are starting words with a capital letter (i.e., upper case), even though elsewhere you have small letters (i.e., lower case). For example:

Policy H2: Affordable Homes: should be Affordable homes.

Attached documents:

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Comment ID: pslp17q/507  Respondent: 8944929 / A Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

10. I object generally to the very poor drafting throughout. If this plan is accepted there will be little opportunity to enforce many of the policies due to poor drafting. This plan needs checking by lawyers on the basis of “can I enforce this policy? If not, which will often be the case, redraft.

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.

2. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

3. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

4. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

39. 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.

Attached documents:

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Comment ID: SQLP16/1788  Respondent: 8948385 / Gillian Eve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

The wording in many of the policies is too imprecise to provide protection. I refer to expressions such as “will have regard to”, “material considerations”, “we expect”, “is proportionate to” etc. Developers will undoubtedly exploit any weakness in the policy wording to drive through their plans and maximise their profits.
Q6 Any Other Comments

- The changes to the Proposed Submission Local Plan are not a reasonable response to the overwhelming objections raised in the original consultation.
- Nothing has been done to address the concerns over the housing number that provides justification for the extensive development plans, the threat to the rural nature of our villages and the inclusion of many sites in the Green Belt.
- Nothing has been done to address concerns over the validity of the traffic assessment and hence the impact of development on traffic infrastructure.
- Some of the changes appear to have weakened Green Belt and AONB protection.

Attached documents:
Ockham Road North, East Horsley (‘the Site’ hereafter). The Site is shown outlined in red on Drawing LOC/001. Please also find enclosed a Vision Framework that was submitted with our previous representations to the consultation in July 2016 for the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2016).

The Proposed Submission Local Plan: Strategy and Sites (2017) sets out the vision for the Borough and the Council’s approach to development between 2015 and 2034. The Council previously consulted on the Proposed Submission Local Plan: Strategy and Sites (June 2016) in June and July 2016. As a result of consultation work in 2016 the Council have proposed a number of changes to the Proposed Submission Plan: Strategy and Sites (2017).

As stated above, we commented on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2016). We have also previously commented on the Local Plan Issues and Options Consultation in November 2013, the Draft Strategic Housing Market Assessment (SHMA) in February 2014 and the Draft Local Plan Consultation in September 2014.

We welcome the opportunity to review the Proposed Submission Local Plan: Strategy and Sites (2017) and wish to ensure that the Plan is found sound in accordance with the Framework, and therefore provide the following comments.

Attached documents:

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**Comment ID:** pslp17q/228  **Respondent:** 8971745 / Catesby Estates Limited  **Agent:** Barton Willmore (Gavin Gallagher)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

Summary
Catesby Estates Limited support the aims and ambitions of the Plan and wish to ensure that the Plan is found sound.

We welcome the Site’s removal from Green Belt and its identification as a Site Allocation within the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017). It is imperative that the Council retains this allocation to ensure that the objectively assessed needs for the Borough are met and unmet needs of the HMA.

The Site is sustainable, well contained and has no technical constraints to its delivery and does not serve any of the purposes of the Green Belt identified as paragraph 80 of the Framework.

If you require any further information or wish to discuss the above in greater detail, then please do not hesitate to contact Jessica Evans or myself.

**Attached documents:**

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**Comment ID:** SQLP16/201  **Respondent:** 9040673 / Anne Pearse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I object.
The proposal for A44 is ill conceived and not thought through. The land in question is known to have a dangerous sub soil as a result of previous landfill, the increase in homes and the travelers site will increase the amount of traffic on roads that are not designed for high frequency occupation, in addition, the types of vehicles used by travellers generally includes higher gross weigh trades vehicles, vans, lordosis, tippers and general building / construction machinery which will be both an eye sore and a danger to the local residents. The housing development will also generate a high number of personal vehicles as in the current age, home usually have at least one vehicle, but as families grow, this could easily become 2,3 or more vehicles with will almost certainly end up being parked on the roads or pavements.

I can not object strongly enough to A44. This development must not be allowed to proceed.

Attached documents:

Comment ID: pslp17q/358  Respondent: 9062913 / Susan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

As requested, this response reflects only comments on changes to the previous draft; both in terms of new text and also comments on deletions which lack acceptable justification. This is as a result of a specific instruction as given by the GBC Executive that only comments on changes will be acceptable.

As a result, I request confirmation that all of the objections to changes made below will be put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and also that all the previous objections to the 2016 draft plan made will be placed before the inspector and that when objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

Guildford is a constrained borough. 89% of its area is zoned as permanent Green Belt. The road network that is already at capacity. I am concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

Attached documents:

Comment ID: SQLP16/1628  Respondent: 9095713 / Melanie Richards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

I object to the methodology used in formulating the plan which has not paid any attention to Village Neighbourhood plans.

Attached documents:

Comment ID: SQLP16/108  Respondent: 9250945 / Peter Tuevey  Agent:
I logged in to find out what was happening. I quickly found an introductory video with the heading: Find out what the draft Local Plan means to some local people by watching the video below I watched it. Most of the "local people" were Council employees with an axe to grind. I call that misrepresentation!

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1762</th>
<th>Respondent: 9326433 / Keith Kerr</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td>Answer: ()</td>
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</tbody>
</table>

I Object to the new Local Plan because of the following:-

Building 13,860 new homes in the area is not viable because the infrastructure is totally inadequate. Squeezing more and more people into such a small area will only lead to serious problems with traffic, pollution, health and education to mention a few. You also should take account of the neighboring plans for 1000,s more properties that have an additional effect on the local infrastructure.

Destroying essential farmland and countryside by covering it with structures producing global warming gases will only exacerbate the communities health problems and lead to more expensive foods.

The plan should make a firm statement that it is committed to improving the life of all the community (and not just for the benefit of the developers and their shareholders) by providing better roads, footpaths, safe cycleways, easy access to schools and healthcare, parks and countryside to play in.

The plan should detail the essential need for council homes for young families and care homes for the elderly. The council have been selling off these essential facilities without replacing similar numbers. The council should stop selling council houses and replace its missing stock as a priority. Building homes for the rich should not be part of the Local Plan.

Growth and Progress should mean making a better life for everybody, it is not about making lots of money and driving big cars.

We must not destroy the countryside which provides the essential elements for us to exist.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/503</th>
<th>Respondent: 9327329 / A2 Dominion Group</th>
<th>Agent: Judith Ashton Associates (Judith Ashton)</th>
</tr>
</thead>
</table>

9.1 We suggest, having regard to the above that:-
i) The level of housing development proposed with the PSLP needs to be increased to a minimum of 15,200 (800dpa across a plan period of 2015 – 2034);

ii) Policy A29 should be revised with all reference to ‘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’ deleted.

iii) Policy H1 should be revised with criterion 9 deleted.

iv) The SA needs to be revisited in the light of our comments above.

Attached documents:

Comment ID: SQLP16/2045  Respondent: 9332545 / John Chalmers  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I had hoped that the new Council would consult (meet and listen) to residents before presenting this proposal but it appears that they have not even met with Parish Councils which again is at odds with how this will be seen by the Planning Inspectorate and all at a great cost to the taxpayer.

Attached documents:

Comment ID: SQLP16/1344  Respondent: 9335041 / David Reeve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

Poor Drafting

I OBJECT that the provisions and policies of this Plan are likely to be challenged by developers, and it therefore needs to be much clearer and more prescriptive.

Specifically, replace “expect” by “require” in the following paragraphs:

Policy H1: We expect 60 per cent …

4.2.4: … we will expect new homes …

4.2.20: … we will expect all new …

Policy H2: Developers will be expected to provide land …

4.2.39: We will expect developments …

4.2.39: … developers will be expected …
4.2.39: … they will be expected to meet the costs …

Policy P1:

4.3.5: … proposals within and adjacent to the AONB will be expected to conserve …

Policy P2:

4.3.23: Replacement buildings are expected to be sited …

Policy P5:

4.3.60: SANGs must be approved by Natural England and will be expected …

Policy E4: It is expected that the new extension will provide …

Policy D1: … be expected to have regard to …

… be expected to use art and materials …

4.5.8: We will expect development to respond …

Policy I3: We will expect that new developments will …

We will expect new development to:

We will expect new developments to demonstrate …

We will expect all applications for development that generate …

Policy I4:

5.6.45: The Council expects the delivery of new SANGs …

**Attached documents:**

---

**Comment ID:** pslp17q/147  **Respondent:** 9444929 / Markfield Investments  **Agent:** Turley (Donna Palmer)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

3.1 These representations should be read in the context of the opportunities for the site to be delivered as a comprehensive development in association with the former allocation at ‘land adjoining Fairlands’. The site itself has not been identified at any previous stage of the Local Plan process, although it is located directly to the south of the former safeguarded allocation at Fairlands which was considered within the Regulation 18 Local Plan consulted on in July 2014.

3.2 Our client’s landholding ‘Land at Dunmore Farm’ comprises 31.69 hectares of land as submitted in previous representations to the Local Plan. The site currently comprises farmland and paddocks with a limited number of existing buildings in the south eastern corner around Dunmore Farm. The site wraps around the former safeguarded allocation to the south-west, south and south-east of Wood Street village. The field parcels themselves are relatively clear internally with trees and hedgerows indicating the majority of the boundaries.
3.3 The site was considered as part of parcel H8 which extended northwards between Wood Street village and Fairlands within the Green Belt. Whilst the site was considered to be of high sensitivity, Volume II of the Green Belt and Countryside Study discusses that there are ‘opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt’. It is clear from the assessment that the main purposes of the Green Belt within this location are to:
- Check southwards sprawl of Fairlands and northward sprawl of Wood Street Village;
- Prevent Fairlands and Wood Street village from merging;
- Assists in safeguarding the countryside from encroachment; and
- Preserves the setting of Wood Street conservation area.

3.4 In this regard, given development opportunities clearly exist to the west and south of Fairlands and were supported through a previous iteration of the Local Plan, the opportunity to create a more comprehensive extension incorporating the site to the north of Wood Street village would assist in delivering a significant quantum of homes, incorporating an appropriate and extensive landscape buffer between the two villages to ensure a defensible and permanent boundary to both villages.

3.5 The creation of a new permanent open area of land between the two settlements could deliver far greater benefits as public access could be provided along with the potential for outdoor sport and recreation which would permanently benefit the residents of both villages and the wider Borough. As such, this would ensure that the requirements of paragraph 81 are met, ensuring that the Green Belt is open and permanent and provides a beneficial use whilst also meeting the five purposes of the Green Belt as stated at paragraph 80 of the NPPF.

3.6 Alternatively, GBC should consider the opportunities to deliver smaller scale development at sustainable settlements such as Wood Street village, in locations where the impact on the function of the Green Belt would be minimised and opportunities to incorporate functional and accessible Green Belt land could be explored.

3.7 As such, GBC should consider further the relationship of Fairlands with Wood Street village to realise the large scale opportunities for mixed use development within this area whilst reinforcing the quality and usefulness of the Green Belt between the two settlements. The delivery of new development could facilitate securing the permanence and openness of the Green Belt between the settlements and to ensure its use is enhanced and is beneficial to the local community as set out at paragraph 81 of the NPPF.

3.8 Throughout the plan process to date, our client has supported the inclusion of the Fairlands allocation within the plan, although wishes to further emphasise the wider opportunities for the area if the site were to be considered alongside Fairlands for allocation within the Local Plan.
- A comprehensive development that would provide not only market but affordable housing to meet the needs of the Borough and any unmet requirements from Woking Borough;
- Deliver a comprehensive masterplan that could incorporate a defensible landscape buffer which would ensure the permanent separation of the villages of Fairlands and Wood Street village by creating new defined edges to the settlements. This would reinforce the findings of the Green Belt Study 2013;
- Direct new development in a sustainable location in line with the settlement hierarchy and enhancement local facilities and public services;
- Provide new development in locations where growth will be required to support the continued economic growth of Guildford as a town centre;
- The potential to incorporate appropriate Suitable Alternative Natural Greenspace to offset the proximity of the site to Thames Basin Heath SPA.

Conclusion

4.1 These representations have been prepared by Turley on behalf of Markfield Investments Ltd in respect of the Guildford Borough Proposed Submission Local Plan (June 2017). The consultation is targeted to the proposed changes to the Plan since the 2016 consultation and the revised evidence base documents.

4.2 Our client has important land interests in the Local Plan area, in particular at Dunmore Farm, Guildford. As such this response focuses on issues which particularly affect the site.
4.3 Each of our responses relates to a particular policy or paragraph and this report is structured accordingly. In summary our submissions are:

• Policy S2 – The Council should endeavour to meet its full OAN and seek to assist in meeting the needs of adjoining authorities, in particular Woking Borough Council, where possible. Further allocations should be made to provide flexibility in the delivery of the Plan and to meet the required increased housing requirement.

• Policy H1 – Insufficient evidence has been provided to justify the Council’s proposed requirement in respect of accessible homes. Concern is raised as to whether the requirements for self-build and custom housebuilding are justified and effective.

• Policy H2 – The proposed affordable housing requirement is not underpinned by a robust and up to date viability assessment and as such is considered to be unjustified.

• Policy P5 – Whilst we have no specific comments on the policy wording itself, we would highlight the importance of ensuring sufficient land is allocated for SANG to enable the delivery of the Plan.

• Policy D2 – Further clarity is required to ensure the proposed policy wording is effective. Flexibility should also be introduced into the proposed policy wording.

• Dunmore Farm – we consider the site presents an opportunity for an additional allocation to help assist in meeting the Borough’s housing needs and the unmet needs of Woking Borough. The site would be capable of delivering an associated SANG which could provide capacity for other proposed developments in the Borough.

Attached documents:

---

**Comment ID:** SQLP16/516  **Respondent:** 9577857 / Nick Wilkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I do not support the increased development of the Green Belt, as it exists in and around Surrey, to this level in proposed in the Plan documents. Specifically but not only, I object to the following areas of development (generally and not specifically):

- **Ockham / Wisley Airfield** - I object to the imposition of a new village development of this scale and the corroborating assumptions. This is based on a number of factors, including but not restricted to transport, amenity, retail, schooling, environmental, density, local roads, impact on current services and villages. The local roads are insufficient to cope with increased residential and delivery traffic
  - the assumption that the population will travel by bike hire scheme to use the local trains is laughable
  - the impact on demand for local services and clubs deleterious to current provision (current residents are on waiting lists - what happens when 4-5000 more people land...?)
  - this will be the start of the in-fill of the land between all the villages (Ockham, Horsleys, Effingham) with a loss of amenity, environment, local character and the increase in pollution, waste, traffic, nuisance, inconvenience, urbanisation and irretrievable loss of Green Belt

- **Development in The Horsleys** - I object to the significant number and increased provision of sites for medium / large scale housing projects in an around The Horsleys. There is insufficient capacity to absorb new developments in the area and it should not be acceptable for mass housing to be imposed in an area where public opinion is against it. The Horsleys are not a large metropolitan area, they do not have the services of a town or Cranleigh-size village and nor do they want them; by continuing to encourage concentration and development in and around these villages, the Council is agglomerating Effingham, The Horsleys, Bookham. Fetcham, Ockham into an homogenous residential area attached to Leatherhead, destroying the character of the Green Belt and passing the point of no return, by which time any control or restrictions on development are futile and the area becomes a suburban ribbon from London and Leatherhead / Guildford

I am opposed to the Local Plan.
As a resident of Clandon Road, Burnt Common I find it incredible that GBC have failed to listen to the residents of Send and Burnt Common who previously in force have objected to the proposed Local Plan. Instead you seem to have made further changes that result in more development rather than less, failing in the duty of GBC to listen to residents.

It seems that you are simply ‘testing’ the patience of residents by repeatedly making further changes without realising that your proposals are completely unacceptable. It is unjust that you are focussing a disproportionate level of development in and around the Burnt Common and Send compared with our areas of the Borough.

I believe the new plan has listened and acted on the previous comments made by myself and others but it is missing some critical points around traffic flow and car parking.

Traffic flow: The Guildford area is already a traffic black spot. The proposal to build on brown field sites in town is excellent but the road network cannot cope now never mind when the building is complete. I see improvements to the A3 junctions are proposed but what about once you are in Guildford? There needs to be another bridge over the river Wey. The access and exit from the railway station, the gyratory near the station, the end of Woodbridge Road (near Curry's/PC World, in/out of Ladymead, Stoke Road/Woking Road junction, North Street/Friary (especially once in the 1 way system) and Epsom Road coming into Merrow. There are others but this list shows an overall transport strategy needs to be developed.

Parking: The development of Park and Ride is good but not on it's own. A series of multi storey car parks on the edge of town needs building. All houses/flats built should have a minimum of 2 car parking spaces each AND further visitor spots. Any attempt to build without sufficient parking will result in a grid locked town resembling a car park.

Please go back to the drawing board and formulate a joined up transport plan.
<table>
<thead>
<tr>
<th>Comment ID: SLP16/1087</th>
<th>Respondent: 10615137 / Nav Nair</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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So in summary, I am opposed to The Plan for the above reasons, with an overriding and saddening conclusion that the proposed growth in housing is not only bad for current residents, but for those that would move in too.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SLP16/1156</th>
<th>Respondent: 10616321 / Petrina Jeffreson</th>
<th>Agent:</th>
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<tbody>
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I find it disgraceful and devious that we seem to successfully campaign against and avoid destruction of the area in one plan (Wisley airfield), we look away for two minutes and then another devastating plan is mooted.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/446</th>
<th>Respondent: 10638209 / Wendy Rockhill</th>
<th>Agent:</th>
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I wish to object to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send. These increase the impact on local areas by increasing the number of houses, traveller’s sites and destruction of even more of the Green Belt, rather than as promised, take account of the thousands of objections to the 2016 Plan and many of its unnecessary proposals. The Green Belt, was intended (and has generally succeeded thus far) to provide breathing lungs encircling large towns and cities, to improve air quality, increase opportunities for city dwellers to experience countryside and fresh unpolluted air, and generally to assist in preserving quality of life.

Many of the proposals will result in Guildford Town in the over populated and congested south east even more than at present, puts the opportunity for ‘breathing lungs’ even further from inner city dwellers reach, and increases the problems caused by potential over-crowding and congested living. The proposals focus on housing, without consideration of health, transport and education provision, unless funded by the sale of property to fund the necessary infrastructure.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SLP16/1879</th>
<th>Respondent: 10653537 / Mike Elrick</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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<td>Answer: ()</td>
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5  GBC planning appeals

5.1 One measure of a successful local plan is the ratio of appeals which are dismissed and allowed.

5.2 Many of the recent successful appeals are the result of members of the planning committee overturning officers recommendations. This often leads to appeal costs being awarded against the Council. This may be due to poor officer reports or members NIMBYism. Either way, this will have to change if Guildford is to come even close to meeting its "objectively assessed need".

5.3 Delegated officers continue to refuse Green Belt applications for the flimsiest of reasons. Once again, the Council has a relatively poor record with an increasing number of appeals being allowed.

Attached documents:

Comment ID: SQLP16/281  Respondent: 10655201 / Robert Owen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I object to the revisions contained in the Proposed Submission Local Plan 2016; Strategy and Sites. In particular sites A46 and A47. My specific comments are shown against the relevant sections.

Attached documents:

Comment ID: SQLP16/1627  Respondent: 10670529 / Jennifer McIndoe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than two weeks notice.

Attached documents:

Comment ID: SQLP16/790  Respondent: 10717985 / Alison Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()
In conclusion, the Local Plan fails to heed previous concerns vociferously expressed by residents in the Borough, and particularly the local residents I discuss the above with here in Send. We love our village and whilst recognise there is a need for housing and some development, wish it to be based on sound and correct evidence, taking into account the Governments’ guidance not to build on Greenbelt without first exhausting brown field site options, and then only after demonstrating exceptional circumstances, and taking into account impact on already straining infrastructure.

Further of course the local Plan does not take into account the dramatic result of the EU referendum – which impacts on every assumption about growth and housing need contained in it.

It is incredulous that in your role as public officers - voted for and funded by constituents, that you continue to offer laughably poor proposals for local development. Your job is to bring benefit to our lives - if your current proposals succeed it will be to detriment of our currently enjoyed and valued quality of life and on our environment. It will be undemocratic.

?Despite obvious and demonstrated concerns of local residents, you continue in your arrogant and ill considered behaviours to attempt to excessively develop our village and in your failure to protect vital and cherished natural resources.

What is more you fail to demonstrate any credible evidence of carrying out a valid appraisal of local need. Your proposals clearly do not reflect local need or interest - whose interests are you actually promoting? In the circumstances it is hard to avoid the suspicion that it is the interests of developers that are being prioritised, particularly given the late presentation of Garlick’s Arch and the A3 interchange and the funding for this being provided by those wishing to develop building at Wisley.

I would urge you to listen and provide a decent, fair and considered local plan.

Attached documents:

---

Comment ID: SQLP16/1254  Respondent: 10721601 / Vivienne Holden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

The previous draft local plan was withdrawn after generating widespread local opposition. Our Mole Valley MP Sir Paul Beresford responded to that; a copy of his comme!lt dated 21 September 2014 is enclosed. His document retains its validity. Sir Paul observed:

“This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough”.

Sir Paul's commentary applies to the revised plan as do other submissions in response to the last draft plan (including my own earlier letter which I attach as well). I object to the revised plan generally for all of the reasons cited in my 19 September 2014 letter in respect of certain sites then earmarked.

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<tr>
<td>Answer: ()</td>
<td>I request a confirmation by email from GBC that all of the objections made above are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan. I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued. Attached documents:</td>
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<td>Answer: (Yes)</td>
<td>I would also like to add that any housing will not benefit any of the local community at present unless 1) The quantities are reduced significantly. 2) It is built as affordable housing, which at present is not in the interest of developers to build houses like this, Attached documents:</td>
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<tr>
<td>Answer: ()</td>
<td>I object to the last minute inclusion of new sites, with no opportunity for discussion. The Garlich’s Arch site proposal is totally disproportionate, even in relation to the site it replaced. Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/20</th>
<th>Respondent: 10799489 / Shai Sinai</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</th>
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<tr>
<td>Answer: ()</td>
<td>I object to the way this whole DLP has been handled with no respect of local opinion and badly arrived at conclusions. Attached documents:</td>
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<tr>
<td>Comment ID: SQLP16/1150</td>
<td>Respondent: 10803297 / John Collomosse</td>
<td>Agent:</td>
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<td>Answer: ()</td>
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<td><strong>Answer:</strong></td>
<td>I object to the poor communication of the revised Plan and limited time available to comment</td>
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<td>The draft local plan including its accompanying volumes is 1800 pages long and we have had only 6 weeks to digest it and comment on it. Indeed I was unaware of the Plan until a couple of weeks ago due to limited notification of the Plan to residents by the Council. Indeed some evidence on which the Plan is based such as the SHMA plan is not even published so it is not possible to properly examine the Plan.</td>
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<td>It is unreasonable to expect working people to read a 1800 page document in 42 days (that’s 42 pages of reading per night on an unsustainable nightly basis) let along digest its content. The website hosting the local plan is in my professional opinion as a computer science academic and chartered software engineer, one of the worst I have seen in terms of its accessibility and comprehensibility.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/1567</th>
<th>Respondent: 10803809 / David Jones</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td>Answer: ()</td>
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<td>I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. I have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.</td>
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<td>I request that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<th>Comment ID: SQLP16/1048</th>
<th>Respondent: 10808833 / David Brandon</th>
<th>Agent: Vail Williams (Suzanne Holloway)</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td>Answer: (Yes)</td>
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<td>Please see attached statement.</td>
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<td><strong>Attached documents:</strong></td>
<td>file</td>
<td>final rep wellington house July 2016 (3).docx (1.1 MB)</td>
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</table>
Comment ID: SQLP16/296  Respondent: 10811393 / Frank Anayi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: (Yes)

Reference to A44 Land west of Winds Ridge and Send Hill.

I do not consider this to be a good location for the proposed development for the following reasons:

1. I understand the site has unsafe land fill waste which may not be suitable for building on.

2. The site is opposite a cemetery.

3. Send Hill is a very narrow road and may not be suitable for extra vehicular access and is congested at the other end near the traffic lights during school times.

4. Access to Send Hill is through either Potters Land or Vicarage Lane on the south side. Both Vicarage Lane and Potters Land are quite narrow and may not cope with large volume of traffic. Exiting the A3 to Potters Lane after the farm shop there is a nasty bend that at the next bend oncoming traffic have to give way to traffic coming from the A3 but there is no give way road marking, the road is very narrow and some of the hedges from houses have overgrown onto the road. Potters Lane require hedge trimming constantly but it doesn't seem to be done properly.

5. I object to large scale development particularly on Green Belt. Send is a nice village and we would like to keep it as a village.

Thank you

Attached documents:

Comment ID: SQLP16/297  Respondent: 10811457 / Mary Anayi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: (Yes)

Reference to A44 Land west of Winds Ridge and Send Hill.

I object to location of the proposed development site for the following reasons:

1. Road congestion. Approaching Send Hill from Potters Lane from the A3 would bring through lots of vehicles through a dangerous bend after the farm shop that vehicles heading to the A3 cannot see what is coming through. There is no Give way sign or road marking to indicate that two cars cannot pass each other at that bend. Furthermore approach to Send Hill from Vicarage Lane is very narrow and cannot cope with large volume to traffic.

2. Send Hill itself is very narrow and very congested at the other end near the traffic lights especially during school times.

3. The site is opposite the Cemetary.

4. I understand that the site has unsafe land fill waste and may cause harm to new residents in newly built houses.

5. Send Village is in the middle of Green belt land and I would not like to see the Green Belt land being used to build on.
Thank you.

Attached documents:

---

**Comment ID:** SQLP16/1598  **Respondent:** 10813345 / Ruth Cope  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
**Answer:** ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

Attached documents:

---

**Comment ID:** SQLP16/1587  **Respondent:** 10816545 / Kent Atkinson  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
**Answer:** ()

**Objection:**

I know that I am not the only person writing, yet again, to OBJECT to your development plans. I hope that the GBC, as our elected representatives charged with representing our interests, will LISTEN TO THE COMMUNITY.

Attached documents:

---

**Comment ID:** SQLP16/69  **Respondent:** 10818241 / Vanessa Birchall-Scott  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
**Answer:** (Yes)

I object to the plans which appear to be unnecessary in terms of need, contravene the green belt "rules", risk reduction in the green belt and significant and unnecessary disruption and inconvenience to the current population

Attached documents:

---

**Comment ID:** SQLP16/1816  **Respondent:** 10828737 / Claire Dawson  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I also believe my environment is worth fighting for to enable future generations to enjoy the precious green belt. I object and will attempt to make my voice heard through any legal means, including my vote.

Stop the ever increasing sprawl of London boundaries! Investment should be made to help the growth and regeneration of other regions of the country regarding employment, infrastructure and housing. Unfortunately we cannot all live in the South East!

Attached documents:

---

**Comment ID:** pslp17q/278  **Respondent:** 10828737 / Claire Dawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

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 houses 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.

Attached documents:

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**Comment ID:** SQLP16/1876  **Respondent:** 10844993 / Simon Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**Conclusion:**

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites. GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

This Local Plan seems to have been thrown together with no real thought, we need a ‘common sense’ Local Plan, not this rubbish

Attached documents:

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**Comment ID:** SQLP16/65  **Respondent:** 10846241 / John Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()
I have no confidence in the current GBC’s ability to carry out the wishes of the majority of residents of Send and Ripley. Their promises to protect the greenbelt have proven worthless. They have ignored the many petitions objecting to the proposed developments which appear to have not taken into account the affect on the infrastructure of our communities.

Attached documents:

Comment ID: SQLP16/184  
**Respondent:** 10849377 / Vickie Leonard  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I am thinking of selling my house to move out of this chaos but now the price of my house will suffer because of this. I am extremely disappointed resident and would like objections to be heard and responded to.

Attached documents:

Comment ID: SQLP16/1209  
**Respondent:** 10858945 / C P Faithful  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

You will receive objections with far more detail than ours but we feel that the points raised above demonstrate our discomfort with the proposals and distrust of the organisation behind them.

Attached documents:

Comment ID: SQLP16/2119  
**Respondent:** 10858977 / Angela Otterson  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**SUMMARY**

I request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.
The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

I am concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In my opinion much of the proposed local plan appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

Attached documents:

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<th>Comment ID: SQLP16/1773</th>
<th>Respondent: 10859553 / MARK Curtis</th>
<th>Agent:</th>
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<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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**Question 7: Any other comments?**

**Comment - Localism**

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of ‘double speak’ has led to absurdities such as ‘affordable housing’ which is over £300,000 i.e. ten times the average salary; ‘safeguarding’ which does not mean protection of land as most people would think, but rather potential future development and ‘insetting’ which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

‘About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life’
May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

Attached documents:

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<tr>
<th>Comment ID: SLP16/1086</th>
<th>Respondent: 10860993 / Peter and Fiona Armitage</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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In conclusion I know residents are frustrated by having to write in objection on more than one occasion in response to "new"proposals that are not very different to the previous proposals - a sure sign that GBC is either failing to learn from residents or even worse not really listening to their views.

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<th>Comment ID: SLP16/1786</th>
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I would like to think that GBC will respond to local residents this time in a manner that is open and transparent. I do not want to be writing another letter of objection on the same grounds again as this one. I feel GBC is trying to grind down its residents in order to push through its proposals. This does not give me any confidence in GBC.

Attached documents:
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<tr>
<th>Comment ID: SQLP16/1403</th>
<th>Respondent: 10868609 / Robert Lockie</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016</td>
<td>Question 7: Any other comments?</td>
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I object to the local plan because I do not feel that GBC knows what it is doing. At a meeting in Send after the proposed local plan had been released Councillor Spooner said (and I quote) ‘We are all here in a mess in this borough.’

Attached documents:

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<th>Comment ID: pslp17q/23</th>
<th>Respondent: 10869921 / Kate Haskins</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017</td>
<td>Question 6: Any other comments?</td>
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I am writing to you to raise my objections to the new draft local plan. I have objected to each draft so far, and I am both disappointed and angered by the fact that my objections, along with the thousands of others, have been ignored. Furthermore, the plan has been added to in terms of the quantity of houses and development in the plan. How can this be justified? Where is any evidence that the community that you are supposedly “consulting with” has in any way been listened to?

I sincerely hope that on this occasion the Guildford Planning Department respond and take into account local objections. I am sure I am not alone in believing that local government should serve its local community and borough as its first priority. There is little evidence in the local plan that this is the case. I sincerely hope that the final local plan shows proper consideration and response to local feedback.

Attached documents:

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<tr>
<th>Comment ID: SQLP16/1307</th>
<th>Respondent: 10871329 / Lyn Gargan</th>
<th>Agent:</th>
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I strongly object to the numerous developers who are buying up plots of land in the hope of building very expensive houses on green belt land.

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<tr>
<th>Comment ID: SQLP16/302</th>
<th>Respondent: 10872993 / Nicola Slynn</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016</td>
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I think that building a road tunnel under the A3 at Guildford is a very good idea. It would materially help traffic flow through the town centre. It would make the A3 much safer as the current junctions are not very safe. Every time there is an accident there the town centre is gridlocked by traffic seeking an alternative route.

It would be so good to have the current A3 acting as a road for local traffic to avoid the town centre. Just widening the existing A3 would not do this.

So much of any successful expansion of Guildford depends on sorting out the traffic and esp the gyratory system. Sorting the A3 is a major step in the right direction

Attached documents:

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**Comment ID:** pslp17q/372  **Respondent:** 10873313 / Rob Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

I am extremely disappointed to need to write to you once again on the subject of the ill conceived local plan and its detrimental effects on the village of Send, surrounding villages, residents, infrastructure/amenities and the Green Belt.

I can only assume that the council has no regards for local impact and the protection of the green areas for future generations as GBC have seemingly ignored us and is determined to push on despite the hundreds of previous objections by locals.

That is frankly appalling and this latest "revision" is a clear attempt to side step all those previous objections, restricting us to only make objections to the amendments. I am sure the council is hopeful that by dragging this out they may wear everyone down - or simply proceed anyway after constant reissues by finding sneaky ways to fulfill their objectives.

This is all made the madder when there are brown field/previous use sites like Wisley Airfield which are a far more suitable location for some new housing, if the council is determined to ignore the local impact, at least that's not green belt.

Anyway, here we are again, registering objections to a plan so impacting that surely someone in power is already aware it is senseless damage to the area.

Attached documents:

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**Comment ID:** SQLP16/1151  **Respondent:** 10873377 / Rebecca Howard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I am also aware that whoever is, or has been leading this work for the Council, does not appear to have applied the new planning framework correctly. Neither have they sought to align this Plan with the guidance received from Ministers.
Whilst I am sure a great deal of energy has gone into designing the online questionnaire and related events, when you stand back from it, this consultation is exclusive. The very fact that you have to write in with your comments referencing "which section, page, policy or map" you are referring to makes it very difficult for many people to comply with and therefore contribute their views. I am used to wading through papers, but to be honest I was a bit overwhelmed when I sat down to this late one evening last week.

If you stand around the village high streets and schools, you will sense and hear a great deal of fear, confusion and helplessness about large developments adjacent to small villages, in particular from those not "into" all of this. You may not receive their written views. I hope local politicians are aware of this.

Attached documents:

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Guildford Council’s 2017 Local Plan is little different from the previous versions, showing again that the Council does not listen to the people it is supposed to represent and arrogantly pursues a damaging trajectory for unjustified overdevelopment of a beautiful borough.

We strongly object because the Plan is based on unknown and unscrutinised methodologies, involves widespread destruction of the Green Belt, makes no provision for planning constraints, is woefully short of infrastructure provision and investment, and will ultimately destroy the character and beauty of the borough.

Attached documents:

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As a resident of Send I object at the proposals put forward in the Local Plan. The residents of Send have already put forward their views during the consultation process with the Borough Council and from these proposals they have been totally and utterly ignored.
I am writing to raise my objection as I am disgusted at the proposals put forward in the Local Plan. The plan should be the result of the consultation process between the Borough Council and its residents, but it appears that the residents views put forward during the process have been totally ignored.

I request a confirmation by email from GBC that all of the objections made above are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

Attached documents:

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Comment ID: SQLP16/1889  Respondent: 10902561 / Maureen Ruddock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

I particularly object to the underhand way in which those seeking to implement the new Guildford Local Plan have gone about things. They have not informed the local population that their objections a year ago would not count. I have only heard through social media that it was necessary for me to write in again and object. Once again so much for democracy! We are supposed to live in a democratic country but the underhand way in which the people responsible for developing the new Guildford Local Plan have gone about things is an absolute disgrace and flies in the face of democracy. I suspect many of the local population are not even aware that their objections last time do not count and of the need to write in and object again – Guildford Borough Council should hang it’s head in shame!

I sincerely hope that my objections will be taken into consideration with regard to the new Guildford Local Plan and that my faith in democracy will to some extent be restored but sadly, I doubt that the local population’s wishes with regard to the area they live in will be respected.

Attached documents:

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Comment ID: pslp17q/329  Respondent: 10903265 / M Stokes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

I also strongly object to amount of traveller and traveling show people sites, which has been allocated to both Send and Ripley, a total of 12 pitches. Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Traveling Showpeople” So why do 75% of them have to be within our villages?

Attached documents:

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Comment ID: pslp17q/314  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()
As a resident of Clandon Road, Burnt Common I find it incredible that GBC have failed to listen to the residents of Send and Burnt Common who previously in force have objected to the proposed Local Plan. Instead you seem to have made further changes that result in more development rather than less, failing in the duty of GBC to listen to residents.

It seems that you are simply ‘testing’ the patience of residents by repeatedly making further changes without realising that your proposals are completely unacceptable. It is unjust that you are focussing a disproportionate level of development in and around the Burnt Common and Send compared with our areas of the Borough.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/465</th>
<th>Respondent: 10914721 / Taj Gilligan</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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<td>Answer:</td>
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The extensive nature of this document, the jargon and complexity that acts as a barrier to most members of the public is unexcusable. We are not all lawyers or public servants who work with this kind of document as part of our employment. There is also the time required to respond in full, and adequate time has not been allowed for this to take place before the VERY SHORT deadline. Few have the spare time or head space to tackle a document such as this, and it should have been offered in a more inclusive way, so the public would have multiple options to respond matched with their abilities. The future of our borough will effect all of us, and especially our quality of life, yet there are many who will not be able to cope with the language, complexity and overcomplication of this consultation. Not all of us have a PhD!

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/611</th>
<th>Respondent: 10915937 / Rona Lester</th>
<th>Agent:</th>
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<td>Document:</td>
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<td>Answer:</td>
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I hope you have a detailed look at your reasons for taking Green Belt land out of the Green Belt and tell us what the exceptional circumstances are. Consider the SIZE an 'new village' in WIsley will have on the local infrastructure. Relook at your overall population assumptions in light of BREXIT and your own consultants figures. Once you have done this, it cannot be undone.

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp17q/195</th>
<th>Respondent: 10924161 / Victoria French</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
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<td>Answer:</td>
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I object to the Policy A42 change at Clockbarn in Tannery Lane to a 33% increase in housing development because it will impact on the Green Belt. It will increase traffic congestion and pollution and adversely impact surface water run-off.

I object to the Policy A43 change at Garlick's Arch of 400 homes and 6 Travelling showpeople plots which represents an inappropriately large development which will change the character of the village and join up Ripley and Send. The amenity of permanent Green Belt will be degraded, replaced with more traffic congestion, air pollution and potential increased river water pollution from run-off - the site is currently a flood zone 2.

I object to Policy A58 at Burnt Common to build industrial warehousing on the Green Belt for all the reasons stated above and specifically when there are empty units on existing industrial sites in Guildford and Slyfield.

I object to the proposal to inset Send Business Park from the Green Belt because there is highly restricted traffic access along Tannery Lane and an increase in this would degrade the Green Belt and the countryside along the Wey Navigation.

The value of open countryside in terms of access and views for physical and mental health has never been better documented, and yet it is constantly under attack from developers and insufficiently protected by local government, causing untold stress to local residents and the threat of the loss of amenity to visitors from far and wide, specifically from the urban and suburban conurbations. This, despite years of objections by, collectively, thousands of people in this area.

The assumption that this area is up for grabs, together with the unbelievably wasteful proposal to expand the A3, will forever degrade this area of Surrey and send a signal that the Green Belt has no value other than financial, and that for a very limited range of business interests. I urge the Council to protect our environment and support a sustainable model for all the people and biodiversity that depend on the protection of this landscape.

Attached documents:

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**Comment ID:** SQLP16/1612  **Respondent:** 10925409 / Tina Higgins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

The Plan has been generated in conjunction with developers who are seeking to line their pockets with no regard for the historic planning restrictions which have served the Community so well for so many years

Attached documents:

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**Comment ID:** SQLP16/1613  **Respondent:** 10925409 / Tina Higgins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I very much hope that common sense and moral decency will, in the end, prevail and that in the light now being shone on an extremely flawed plan that you consider the real needs of those affected and not just of those who will benefit (in no small way) financially.

Do you really want to be held responsible for depriving future generations of our valuable Green Belt?
In conclusion we object in the strongest possible terms to the forced growth in the Plan and the resultant destruction of our villages and way of life.

We have read and fully support the submissions made by East Horsley Parish Council on 13th June and 4th July.

Finally, I am concerned to read reports that there may be laws or regulations that may have been breached or may breached as a result of the making or implementing of the above proposals. If in the unfortunate case that there are such breaches involved in these proposals then residents obviously also reserve their rights to pursue whatever legal remedies or actions that jointly or individually may be available to them.

I object

(Yes)
I object to Policy A43 Garlick's Arch

There is no need for any more houses or warehousing in this area.

This site was not included in regulation 18 draft and has not been consulted upon previously.

It is GREENBELT permanently protected by NPPF which prevents the merging of settlements.

The site has a particular conservation sensitivity as it is covered in ancient woodland with a wildlife population that needs protecting.

If there is a need for more industrial space then Slyfield is the intelligent and obvious choice.

A new interchange onto A3 from this site would be a disaster for the community, for the safety of young and old, for nature, for congestion and would show a complete disregard for this wonderful slice of GREENBELT land remaining.

I object!

Attached documents:

**Comment ID:** SQLP16/50  **Respondent:** 10959425 / Jan Lofthouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I wish to see the following changes in the Local Plan:

**WISLEY AIRFIELD**< THREE FARM MEADOWS REMOVED AS A STRATEGIC SITE

It is simply not feasible and insufficient land is under the control of the developers/agents

There is no access from the A3 apart from for waste for S C C and certain limited traffic movements per day

There needs to be:

- A realistic housing target that focuses on the needs of Guildford and takes full account of the constraints of being a congested gap town.
- High priority given to providing attractive campus accommodation so 80-90% of university students will want to live on campus freeing up hundreds of affordable homes in the town within 5 years.
- A bus interchange which means you can travel easily in any direction from one central point without needing a car.
- Another crossing over the railway and river for our divided town and firm plans for an A3 tunnel.
- Guildford’s green setting, tree lined approaches, fine views, historic centre and riverside maintained as valued and distinctive features of the town.
- Proper account taken of the permanence of Metropolitan Green Belt as well as the protection of the Surrey Hills Area of Outstanding Natural Beauty

Attached documents:
Lastly I would like to object to the lack of consideration given to the 32,500, responses to Guildford's last disastrous plan. We live in a democracy and demand to be heard. This new plan reveals the undemocratic nature of Guildford Borough Council and suggests that there is corruption and ignorance at the heart of this council.

Attached documents:

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1. FINALLY, I object to my so-called elected representatives complete disregard for the democratic process which elected you to the positions you now hold. You are in place because of the votes of local residents, your electorate, who are expressing their opinions. If you were facing elections today and this was a manifesto commitment, even your most committed stalwarts would be able to express their democratic view. To attempt to impose such a Plan mid-term is a flagrant disregard for your constituents.

Attached documents:

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From what I have seen of the “Strategy and Site Issues and Options” (SSIO) 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 SSIO Document spell out the destruction of what causes Surrey to be unique and will devalue the quality of life of most of the Borough’s residents. I do not believe that the residents of Guildford have at any time given the Council this mandate.
Certainly the worst thing that Guildford Borough Council could do would be to implement a local plan which would destroy much of the Borough’s charm and heritage, by removing our villages from the protection which our unique and wonderful Green Belt provides and allowing them to be swamped by large scale estates, which will irrecoverably change the character of our Borough for the worse, and to the detriment of all who live here. This is the opposite of what a good, democratic and properly consulted Local Plan should be, and the reason I object to the Plan and its proposed Amendments.

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 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 Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

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 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.

Attached documents:
It is clear that all previous objections to proposed local plans have been ignored.

I am particularly concerned about the increase in proposed residential development in a village where there is already inadequate provision in the form of medical facilities, schooling, and shops.

In your documents you refer to protecting the environment but by removing Send from the Greenbelt you are not doing this.

Attached documents:

Comment ID: SQLP16/1625  Respondent: 11012161 / Wendy Gathercole  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

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.

Attached documents:

Comment ID: SQLP16/1824  Respondent: 11015329 / Nick Riederer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I urge the Council to-

1. Think again on a local scale and consider what is actually needed by the people living in the borough and not some artificially inflated requirement that will only benefit building developers in the short term.
2. Go back to Central Government and seriously question the whole premise of this notional housing requirement. Can we really need over 4000 houses in the local area when it will only compound the pressure on local facilities and have a major negative impact on the local environment, adversely affecting the quality of life of all those currently living in the Guildford environs.

I believe that there is plenty of room for new housing and properties that could be refurbished in other parts of the country, without the impact to sensitive environmental and designated Green Belt or conservation areas where effort should be put to regenerate both jobs and industry supported by investment in affordable housing.

Attached documents:

Comment ID: SQLP16/231  Respondent: 11016001 / Brenda Tulloch  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I object to the use of Green Belt land - this was proposed in 1935 and should not be taken away for future generations.

Despite repeated election promises to protect the Green Belt. Any new housing should be built on brown fill sites so that local facilities can cope with smaller increases. Regarding Policy A44 - Send Hill is a very narrow road with no pavements - any increase in traffic would make this very unsafe for the children attending the school at the end of the road. Also on Policy A44 - the land west of Winds Ridge and Send Hill is unsafe to build on due to landfill waste giving rise to environmental risks (methane gas, asbestos etc)

Attached documents:

In writing this email I intend to outline my objections to the 2016 Draft Local Plan. Before raising my specific objections, I wish to express my disappointment at the Local Council's stance with regards to this matter.

The role of Local Councils is to serve and represent the local area, in the interests of its inhabitants. With a greater understanding of the local area than Central Government, a Local Council is in a unique position to protect those inhabitants from policies which are not only against the interests of those inhabitants, but are also inadequately thought through, where local context may be overlooked, perhaps not in bad faith, but overlooked nonetheless, by centralized bureaucracy. Regrettably, the 2016 Draft Local Plan appears to fall in this bracket.

Attached documents:

GBC is there to serve the needs of its people and was duly elected to do so, so why does it constantly fail to listen to the public its designed to serve.

In summary the Plan remains flawed and needs significant development and should therefore be rejected

Attached documents:

Answer: (Yes)
The number of houses planned has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 Draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan.

- 65% of new houses in the Borough are to be built on land that is currently in the Green Belt.
- Section 150 of the Housing and Planning Act 2016 states that a site, once identified in a Local Plan, is assumed to have permission to go ahead in principle, which means normal planning restrictions may be difficult to impose later.
- Little notice has been taken of the comments received after the last round of consultation.

**Traffic and parking**: Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

- **Local Road Network**: 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 almost 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.

- **Flooding**: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope.

- **Schools**: Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

- **Medical facilities**: Similar situation to the schools.

- **Loss of Green Belt land**: Sadiq Khan, new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

- **Transport**: Misery for commuters, nowhere to park and full trains at commuting times

**Attached documents:**

**Comment ID**: SQLP16/521  **Respondent**: 11036129 / George Dokimakis  **Agent**: 
**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  
**Answer**: (Yes)
I am putting all the comments here as they apply to a number of sections and the method of providing feedback is slightly ludicrous and geared towards making it difficult to provide comments.

Overall a good starter plan but it doesn't go far enough or is sound enough. Unfortunately the plan does not address the borough’s needs.

We are in need of housing both social as well as for the professionals in low to average income jobs that support Guildford Borough’s. Nurses, police offices, retail workers, bus drivers and a raft of other professionals struggle to find affordable accommodation within Guildford. This results in most of them leaving outside Guildford and commuting into town resulting in part to the traffic gridlock most of us experience on a daily basis trying to traverse the city centre. The policies put forward by the GBC do not address the needs of our Borough.

You need evaluate high-rise, high-density buildings within the centre of Guildford before allowing development in the villages and in the Green Belt. Woking is a good example where multi-story buildings blend in to the city’s life and provide a young and vibrant population. such an approach would make the town more vibrant and provide the much needed accommodation.

You should use the council-owned building company to provide innovative housing accommodation your young professionals such as Multiple Occupancy Houses.

You need to ensure that social housing is provided that addresses our current needs instead of mandating a 40% quota of affordable housing. The “affordable” housing proposed by the Local Plan is not affordable for most of our residents and ti is a ridiculous measure to use.

You need to consider the aging population and provide accommodation suitable for our aging population and include policies that protect the existing bungalows used by our older residents.

You should mandate that the 12 Building for Life principles apply to every housing development and only by exception allow developments to not meet these standards.

We need to respect the nature and character of our villages and impose a maximum development target of 20% housing every four years (of the total number of houses envisioned in the Local Plan).

We need to increase the land allocated for offices and manufacturing. We envision Guildford Borough to be a city in its own right and go beyond the commuter town envisaged by the current Executive Committee.

I strongly support the protection of all Areas of Outstanding Natural Beauty and I am glad this is in the plan.

The infrastructure model needs improvement. You need to put forward a travelling and commuting scheme that encourages and promotes the use of public transport over car usage. more areas to be pedestrianised and for more cycling lanes.

I support to plan to redevelop the bus station and make it a station our residents can be proud of.

the development of of River Wey should be included to the Local Plan and ensure a holistic development for our riverfront and town centre.

More innovative approaches should be undertaken to providing the required infrastructure such as working with existing GP services to expand current premises or create additional GP branches to support the increased development.

Finally, I ask you to be transparent and provide a full and detailed analysis of our development SHMA targets. The development of the GBC is integral to this Borough’s future and our residents will support such development where transparency exists and all other options have been considered and exhausted. Currently this is not the case. be transparent in everything

Attached documents:
The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

Attached documents:
| Comment ID: SQLP16/1825  Respondent: 11037217 / Bo Johnson  Agent: |
|--------------------------|---------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? |
| **Answer:** () |
| In summary, whilst I understand that development of the Borough is required, this current local plan is totally flawed, unsustainable and will ruin our beautiful countryside for current and future generations. I object in full to the current local plan and feel that a complete overhaul is required. Should this plan be accepted, I can assure you that I will be objecting to every planning application that may come our way that I feel is detrimental to our village. |
| **Attached documents:** |

| Comment ID: pslp17q/366  Respondent: 11040705 / Patricia Cullimore  Agent: |
|--------------------------|---------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments? |
| **Answer:** () |
| I have already objected to the proposed 2016 plan and now you have come back with another plan that is even worse. Will you take notice this time or keep going until we submit to what you appear to want? Your current proposals are completely unacceptable and so again I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes which will affect my home in Ripley and also in Send, and destroy my reasons for buying a property in this area. |
| **Attached documents:** |

| Comment ID: pslp17q/254  Respondent: 11041569 / Peter Belton  Agent: |
|--------------------------|---------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments? |
| **Answer:** () |
| Having reviewed the amendments to the 2016 Draft Local Plan under regulation 19, I am deeply concerned to see that the Council has ignored most of the concerns raised by Borough residents in both the 2014 and 2016 consultations. I am concerned that there are conflicts of interest within both the Council and Central Government, and indirectly some elected representatives at both levels stand to profit from the property market as a result of this unfettered push for development. Hidden among the amendments in this controversial regulation 19 review, is further extension of the earlier proposed developments, including increased house numbers and expanded business space allocation, and intruding further into protected green-belt land. There is also a blatant disregard for the risks of developing areas in defined flood-zones 2 and 3, with such wording removed from a number of policies. I objected to such proposals in both previous consultations. There is the potential for demand for housing to decline when Britain leaves the EU, especially in areas like Surrey, and the Local Plan does not take this into account. There are many brown-field sites in the Borough, and it must be mandatory to develop these before any other sites are even considered, regardless of developers shying away from them. |
| **Attached documents:** |
Our elected representatives at all levels must conduct themselves with due diligence and integrity, for the long term future of all, including their own children, not for the short term profit of a few.

This Local Plan shows no integrity nor validity, just a hidden agenda for development at any cost.

Attached documents:

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Comment ID: SQLP16/1389  Respondent: 11042433 / Sam Thompson  Agent:

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<th>Document:</th>
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My wife and I met while studying at Surrey University in Guildford. We moved away after to university to Essex and then other parts of Surrey for several years before making the decision to move back near Guildford and Woking, settling in Ripley.

We made this decision because we love the area – why – because of its beauty and how rural everything is. Concreting over our countryside to satisfy some arbitrary housing figures would actually remove the reasons we decided to settle and start a family here!

We cannot continue building additional housing forever as it is simply NOT sustainable in the long term.

Attached documents:

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Comment ID: SQLP16/1652  Respondent: 11044129 / Christopher Barrass  Agent:

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<th>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</th>
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I have lived in West Clandon for 30 years and in Surrey nearly all my life.

For a large part of that time Guildford Borough Council (GBC) has understood and supported the wishes of its electorate to retain the heritage and natural character of this beautiful part of the Surrey Hills.

Indeed in 2009 GBC successfully challenged the Government’s South East Plan (SEP) to build 422 homes a year – 100 more than initially recommended by the South East England Regional Assembly – led by the Leader of the Council and the Head of Planning.

However, the same Council’s draft Plan of 2014, went completely against this precedent, proposing wholesale destruction of the Green Belt with development and claiming that more than double the number of homes previously rejected as being too many should be built in the Borough.

As the people who pay for the Council’s personnel and services to look after our best interests the overwhelming majority of ratepayers were appalled and said so in the so called ‘consultation’ for that draft Plan.

Of some 22,000 responses the vast majority were objections against the draft Plan and specifically against building on the Green Belt.
So what had changed? The Leader of the Council had changed, and with it, apparently, the entire policy towards development in the Guildford Borough.

With the architect of the draft Plan, appointed by that Leader, discovered to be a fraud and forger, and with so many objections, the draft Plan was withdrawn for reconsideration.

In the face of a new political force – the Guildford Greenbelt Group – those seeking election from the Conservative Party assured residents ‘Conservatives Say the Green Belt to Stay’, as printed on countless pamphlets.

It was with this reassurance that today’s Conservative Councillors were elected, THEY WERE NOT ELECTED WITH A MANDATE TO BUILD MASSIVE DEVELOPMENTS OVER FIELDS AND GREEN BELT.

Now the new draft Local Plan has been published but, far from reducing green field development, it INCREASES the numbers of houses planned for green field development!

So, Guildford Borough Council has ignored the consultation process for this latest draft Plan, and the Councillors who voted for it to go to consultation have demonstrated that they gained election on a falsehood.

Guildford Borough Council DOES NOT HAVE A MANDATE FOR THE POLICIES AND SITES IN THIS 2016 DRAFT PLAN AS THEY WERE REJECTED IN THE CONSULTATION FOR THE 2014 DRAFT PLAN, AND ITS COUNCILLORS WERE ELECTED ON THEIR FALSE PROMISES.

I quote from Guildford Borough Council’s own memorandum to Parliament (see: http://www.publications.parliament.uk/pa/cm200910/cmselect/cmseast/memo/housing/ucm3102.htm):

“5.1 Guildford Borough Council supports the fundamental principles of the Green Belt, as set out in PPG2: Green Belts (1995). They are:

? to check the unrestricted sprawl of large built-up areas;

? to prevent neighbouring towns from merging into one another;

? to assist in safeguarding the countryside from encroachment;

? to preserve the setting and special character of historic towns; and

? to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.2 The Council does not believe that the protection of this designation for the purposes above can be linked to an increase in HMOs. As discussed, the cause of the increase in HMOs relates to many social and economic trends and policies which need to be addressed to attempt to reduce the number of HMOs. Equally, the occupants of HMOs tend to be young, single, transient people who wish to locate in town centres, close to jobs, services and public transport. A rural location would not be preferable for such a use.”

The Council should be supporting this policy.

The current draft of the Guildford Local Plan is without support from the residents it is meant to be for (not those the Council seems to believe it is for – developers), it is unsustainable, deeply flawed, particularly in its evidence base and non transparent SHMA, and is not sound.

My objections are laid out below. Many of these are shared with others, nevertheless they represent my views and I would like my objections registered as responses to each policy and site indicated to go before the Inspector.

Attached documents:
Comment ID: SQLP16/1878  Respondent: 11044513 / Jon Stranger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

As a general observation, I and everyone I have spoken to feel seriously let down by Guildford Borough Council. Rather than serve the local population which has elected them, this Plan seems to have been developed without any mandate or declared manifesto and rides roughshod over local residents’ views and needs. And the fact that the video of ‘local people’ on your website is almost entirely limited to those with a political or commercial vested interest is a clear indication of GBC’s priorities.

Attached documents:

Comment ID: SQLP16/570  Respondent: 11044865 / Phyllis Anne Mayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: (Yes)

Dear Planning Committee

Whilst we completely relate to and understand the dilemma the Borough finds itself in particularly regarding the housing shortage, we strongly object to Send no longer being part of the green belt. We bought in this area because it was green belt and we could enjoy semi rural living and escape the busyness of the Towns and Cities. We cannot possibly understand how it can be justified building near the Wisley interchange, in close proximity to Send, which is already so horribly congested and when there is an accident it is mayhem on the A3, North and South bound routes. Not to mention Ripley high street being used as the diversion route to avoid accidents and rejoin the A3 just before Wisley.

All the wildlife - deer, foxes, rabbits etc - surely these animals need to be protected in all the wooded areas.

We are concerned that all the beautiful oak and other trees will also be cut down to create open spaces, completely destroying the current beautiful Surrey landscape, making it look like a concrete jungle.

We can agree to some increased housing but the scale being proposed is beyond what the existing infrastructure can manage, and any future changes to the infrastructure we believe will be insufficient to manage all the new housing.

Please do not destroy our greenbelt areas in Surrey, surely there are enough derelict brown sites standing empty that can be rejuvenated to cope with affordable housing opportunities and by doing so clean up and improve many ugly areas around Surrey.

Thank you.
I believe the proposed new interchange will add to the traffic using the A247 as a short cut to avoid hold ups which are quite frequent between the A25, M25 & the A3

Para 2.5 'pockets of deprivation'. The official definition may well include both income and crime, but they are not cause and effect. I understand that cyber-crime is one of highest incidence in Surrey. The point of this paragraph presumably is to highlight the wide disparity of income in the borough, and which is a major cause of the demand for social housing. These three paragraphs could be reworded to reflect that rather than talk of 'deprivation'. Some data showing the wide distribution of income across the borough would illustrate the point more effectively.

Policy H1 - Homes for all. There is no explicit mention of bungalows - basically one-storey properties. These are essential for residents with mobility impairment. I suggest the policy includes words to the effect that we will not look favourably on planning applications which seek to demolish a bungalow/s - in order to replace with one or more properties with upper storeys -unless there are genuine and compelling reasons to do so.

To conclude, I hope you can see that my objections to the current Local Plan are considered rather than emotive and that you will address the points I have raised when amending the plan.
### Comment ID: pslp17q/36  **Respondent:** 11051521 / J and M Baylis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** (Yes)

In some places the Plan has been strengthened with respect to emphasis on and preservation of heritage, countryside and visual amenity, notably in paragraphs:

Contents list Policy P1, paragraphs 2.1, 4.1.1, 4.1.4, Policy P1 (inclusion of AGLV), 4.4.56, 4.4.59, 4.4.67, 4.4.68, several items in Policy D1 and many in D4 (see below).

I welcome all of this.

### Comment ID: SQLP16/2035  **Respondent:** 11071649 / Martin Southcott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I strongly oppose the submission local plan as it currently stands, but believe that it can made suitable if changes are made to fully address my concerns and the more detailed concerns of the GRA response.

### Comment ID: SQLP16/1588  **Respondent:** 11078337 / Giselle Hampton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

We are grateful for the opportunity to Comment on the Draft Plan and are supportive of certain aspects in relation to the development in the sustainable locations of Guildford Town Centre and urban areas and on other land such as countryside beyond the green belt and on urban extensions to Guildford, Ash and Tongham.

We believe that the current plan to deliver 1-3,860, new homes fails to take into account the additional infrastructure and other supporting resources that would be required.

We are completely opposed to any of the suggested changes to the Green Belt and any proposals to inset villages and increase settlement boundaries.

Specifically we reject the proposals for the development of the former Wisley airfield site.
Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-nr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.
Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1928</th>
<th>Respondent: 11458241 / Bewley Homes</th>
<th>Agent: Bewley Homes Plc (David Neame)</th>
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<td><strong>Document:</strong></td>
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Bewley Homes' representations in relation to the Plan as a whole and specific paragraphs, policies and proposals are set out in the attached representations documents that clearly identify those sections of the Plan that Bewley Homes consider to either fail to be legally compliant, are unsound, or fail the duty to cooperate. In relation to the tests of soundness these are identified in bold against each section of the Plan that Bewley Homes is making representations against.

Neame Sutton Limited wishes to participate in the Examination on behalf of Bewley Homes Plc to expand upon its representations contained in the attached documents specifically (but not limited to) the following matters:

- The content of the SA
- The total housing requirement being planned for
- The housing delivery strategy
- The Green Belt boundary review process
- Bewley Homes' proposed additional housing

Further detail is set out in the attached representations documents.

**Attached documents:**

<table>
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<th>Comment ID: SQLP16/1980</th>
<th>Respondent: 13579713 / Roger Daniels</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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<td><strong>Answer:</strong></td>
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No.

Lightwood Strategic has no further comments at this time.

**Attached documents:**

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<th>Comment ID: SQLP16/220</th>
<th>Respondent: 14058241 / Hannah Dawson</th>
<th>Agent:</th>
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<td><strong>Answer:</strong></td>
<td>(Yes)</td>
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I would like to make it clear that I am incredibly disappointed in the way that GBC has put this plan forward to residents. The almost complete lack of information is appalling. It is completely inappropriate to only have 3 unpublished drop in sessions. For documents to only be available at council offices during office hours or for local libraries to not even know where the documents are. We had to ask 3 members of staff in Guildford library to see the documents and instead of these being presented in an open and organised manner they were stuffed in a box and hidden at the bottom of a shelf.

I am also thoroughly unimpressed with the manner in which you are asking people to give their opinions. It is again totally inappropriate to expert people who have had to wade through multiple documents to find out what the proposals are to then have to do the same to give their opinion.

In general I support the plans and think that those involved are trying to benefit the borough but the way this consultation has been carried out makes it look like they are ashamed of what they are proposing and want to make it as difficult as possible for people to give their views.

My main concerns with the proposals are the number of car parks that are being proposed as sights for housing and the impact this will have on trade. The lack of any definition as to the community facilities which will accompany new housing projects - these are vital to both new residents and the existing residents who will have to cope with the increase in housing. I am also not happy with the lack of road plans which have been put in place - these need to come first and therefor should be in the forefront and being planned now.

Attached documents:

Comment ID: SQLP16/595  Respondent: 14143457 / Hermes Investment Management Limited  Agent: Turley (P Keywood)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: (Yes)

Please refer to the Turley letter dated 18 July 2016 submitted on behalf of Hermes Investment Management for detailed comments.

Please also refer to the Site Plan which forms part of the representation, plus the Preliminary Flood Risk Assessment prepared by WaterCo.

Attached documents:  HERL2015 LT 18-07-16 Representation Letter to Draft Local Plan on behalf of Hermes.pdf (95 KB)

HERL2015 Representation of behalf of Hermes - WaterCo Flood Risk Assessment w10122-160718-FRA.pdf (4.2 MB)

HERL2015 Representation on behalf of Hermes Site Plan.pdf (149 KB)

Comment ID: SQLP16/582  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: (No)

Below is the complete Guildford Vision Group Reg 19 consultation submission:
The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
3. Redirection of vehicle traffic away from the centre
4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

These are not unusual or unique objectives. They are the aim of a multitude of UK towns and cities, where many have taken positive action to bring them about. Many would envy Guildford its magnificent setting and the river running through the centre of town, yet Guildford has failed significantly over the past decades to take full advantage of its potential, especially its river. Riverside areas are taken up by surface car parks, buildings with their back to the water and suffer a legacy of piecemeal, unattractive light industrial development. Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:

- Our 2013 document ‘Guildford on the Way’, a Vision for Guildford in 2030 (attached) as articulated by members of the public, Guildford residents and our members
- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

The council, in response to our lobbying, commissioned a masterplan for the centre. The masterplan was drawn up by Allies & Morrison, nationally-renowned masterplanners. The masterplan was approved by the council in March 2016 but is yet to be adopted. There is little recognition or acknowledgement of the masterplan in either the Local Plan policies, underpinning information or implementation strategies. We understand that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

We made a lengthy response to the Reg 18 consultation nearly 2 years ago. Our comments remain very relevant and are re-submitted for the Reg 19 consultation.

The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

The single, most significant omission regarding the town centre and its infrastructure is a cohesive plan to redirect traffic away from the centre via a new East/West link as proposed by GVG. This was mentioned in our previous Local Plan 2014 submission. A sketch of the link is reproduced here with the new rail/river bridge arrowed:

[see attached file 'GVG bridge route.jpeg']

Such a link would instantly enable wider pedestrianisation of the town centre – specifically Bridge and Onslow Streets – bringing a safer, less polluted environment. The bridge would also enable the reinvigoration of the riverside on both sides, below the bottom of North and High Streets, and the demolition of the ugly four lane concrete Friary Bridge that blights the character of our historic gap town at its very centre.
There is no attempt in the Local Plan to safeguard any potential route for such a new East/West link.

There has been no new town centre East/West link across the railway and river since the building of the Farnham Road Bridge in the 1840s. The Farnham Road bridge capacity is constrained, is rapidly approaching the end of its safe life and is too low for modern rail freight traffic (as set out in the rail ‘Wessex Plan’).

The level and importance of development to the West of the town since 1840 should surely suggest a need for another link. The town centre and Guildford’s health and economy is at a disadvantage from inadequate and imperfect links to key sites such as the Royal Surrey Hospital, Surrey University, the Research Park with its world class and world leading facilities and activities. If large housing development is to be accommodated to the West of the town then there should be adequate provision for the inevitable increase in consequent vehicular traffic from such development, irrespective of the impact of modal shift and sustainable movement policies. Guildford is a gap town, with topographic constraints on solutions such as a ring road. The beauty of its setting also provides constraints.

Within a wider pedestrianisation in the town centre there should be provision for better pedestrian routes to the Cathedral and University. The Local Plan makes no attempt to achieve that, to the detriment of the town and its sense of community.

GVG is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. Development includes additional new town centre housing, including much needed affordable. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

In a well-meaning, almost obsessive, focus on its sustainable movement corridor and modal shift, the council leaves itself unfortunately blind to the need now for a modern transport interchange in the centre of town around the railway station. Guildford holds a key strategic position halfway between Heathrow and Gatwick airports and should seize all the opportunities that airport expansion will bring. The Local Plan has little if any comment or concrete plans regarding the rearrangement of bus services necessitated by the North St development.

Sadly the Guildford Vision Group therefore finds the Local Plan unsound, inadequate and unambitious in respect of the town centre.

Attached documents:
- [GVG bridge route.jpg](attachment:GVG_bridge_route.JPG) (58 KB)
- [2014 LP submission.pdf](attachment:2014_LP_submission.pdf) (948 KB)
- [Guildford on the Way.pdf](attachment:Guildford_on_the_Way.pdf) (1.4 MB)

Comment ID: SQLP16/15  Respondent: 15057889 / Katherine Pyne  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: (Yes)

I object to the overall plan which i feel needs to be reconsidered with the views of the local residents taken into consideration.

Attached documents:
**Comment ID:** SQLP16/61  **Respondent:** 15062017 / Neil Aust  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (Yes)

It seems that “sustainable” is inserted into any sentence involving development with no sustainable credentials whatsoever to make it more palatable.

What is sustainable about building over green-belt sites?

Is the development going to be fully eco-friendly an self-sufficient in power and water? (rhetorical question because of course it's not).

Is development going to be 100% built using renewable or recycled materials sourced from responsible suppliers? (another rhetorical question because of course it's not).

Is the energy input into the materials and development techniques being monitored and developers being held to account? (again, a rhetorical question because of course it's not).

What’s happening about the transport, water, power and telecoms infrastructure to support each development? Is the developer paying for all of this or are we having to fund the expansion of Guildford through our council tax?

**Attached documents:**

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**Comment ID:** SQLP16/27  **Respondent:** 15063745 / John Pryce  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (Yes)

It is morally wrong to destroy the Green Belt - it MUST be preserved for our children, grand-children and future generations. To let it be built over is shameful, and Guildford Borough Council should do everything in its power to preserve it.

**Attached documents:**

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**Comment ID:** SQLP16/32  **Respondent:** 15066369 / Adam Fairbairn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (No)

This whole plan is unacceptable. There are already enough houses and in regards to the video and hospitals which are struggling, if it hadn't have been for the unnecessary cuts which have been enforced by our government, people wouldn't be struggling as they are. These plans will disturb an equilibrium with water drainage and cause flooding - look at Guildford over the winter for example, which suffered from flooding when all the water descended on the town. Adding more houses will require more drainage, foundations will be disturbed and this will only lead to even more flooding in the future.
If 400 houses were added and each house had 2 children for example, that's 800 additional children that need to be taught. You might add a school or two, but being able to teach 800 students in 2 schools is not going to be likely. In the end, this will have to be funded by us, the tax payers and the consequences of more houses also means the following:

More crime
More traffic
More pollution (light and sound)
More drugs
More rodents
More litter
Death and killing of many animals

The list goes on but that is just a sample.

Why is the green belt being targeted again?! It is green because it is meant to preserve ecology and encourage the growth of natural wildlife. Building houses has the opposite effect - more houses means more people and humans do what they naturally do (and might not necessarily be allowed to) and reproduce. Having more houses would end up being a catalyst for bringing more children into an already overpopulated world. I strongly object to these plans - the population is high enough already and giving people more space to bring more people in to the world only makes it worse. Do not complete these buildings and junctions.

These plans should not be reconsidered, they should be scrapped because:

-There is too much traffic already in Surrey
-There are enough people in Surrey
-The A3, Woking and Guildford are already under too much strain from traffic

-Building these houses is only going to be another haven for commuters to London where people who don't want to live in London come and Live in Woking/Guildford and go to London for their job. When I was working in London, the traffic coming from Woking was bad enough. Things will only spiral out of control and traffic in Guildford will become as bad as it is in London - it is already on its way to being like that already. Do not complete these plans for the sake of everyone.

Attached documents:

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**Comment ID:** SQLP16/41  **Respondent:** 15067393 / Anthony Fairbairn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (No)

I object to Policy P3, Policy A 43,A44.
The woods at Garlicks Copse date from the sixteenth century. To rip them up would allow water to flow down the slope to Send Marsh Road and put houses in Send Marsh Road at risk of flooding.

Plans need to take into account traffic flows, especially through Send which is already bad during rush hours.

Housing developments need to take into account the knock on effect on local services - hospitals, GP's and schools.

**Attached documents:**

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**Comment ID:** SQLP16/53  **Respondent:** 15081569 / Gary Cable  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (Yes)

Policy P2 states Send should not be removed from the Green Belt - many parts of the local plan completely go against this policy and I object to any areas of this vulnerable bit of land being removed from the Green Belt. Send provides a wonderful countryside buffer between Woking and Guildford and this local plan would lead to the whole area eventually becoming an urban sprawl.

**Attached documents:**

---

**Comment ID:** SQLP16/838  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**SUMMARY**

I request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
I am concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In my opinion much of the proposed local plan appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

Attached documents:

---

**Comment ID:** SQLP16/126  **Respondent:** 15097569 / sally Chandler  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I wish to complain about every aspect of the local plan. I still find it impossible to use your site. Will you please respond stating that my objections to every section have been recorded

Attached documents:

---

**Comment ID:** SQLP16/87  **Respondent:** 15098145 / Lisa Kenny  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (Yes)

I am writing to object to the Draft Local Plan with particular concerns for Send and its surrounding area. I wish my concerns to be seen by the planning inspector and taken into consideration when a decision is being made.

My first concern is that Send is being removed from the Green Belt. This is extremely concerning as one of the original functions of Greenbelt Land was to act as a buffer zone between large urban areas thus preventing urban sprawl. The restrictions on development have always allowed settlements to maintain their own identity and prevent smaller settlements becoming engulfed. This completely goes against one of the aims of the plan which is to ensure sustainability. Sustainability means meeting the needs of the present without compromising the needs of the future. Removal of Greenbelt status could mean no future for the village as it is engulfed or grows so large it's sense of community is lost.

My second concern is that my understanding was that if significant changes were made to a plan, a full consultation was required. Having read the plan I was shocked to see that a new road junction is planned on the edge of the village. This has not been mentioned previously. Linked to this is the plan for 400 new homes at Burnt Common. This will put extreme pressure on local services along with adding to congestion and thus air pollution. In addition, Greenbelt Land will be destroyed which is completely unacceptable and clearly not inline with the 'sustainable' aim of the plan.

It is widely accepted that Brownfield sites are the most appropriate sites for redevelopment as they already have well developed infrastructures and do not require the destruction of the natural environment. With this in mind, you can appreciate how concerning it is that you seem willing to allow development on so many areas of Greenbelt in and around Send. Growth of the village would put additional pressure on the infrastructure and services and at peak times the main Send Road already struggles to cope. What also doesn't seem to have been considered is the addition of impermeable surfaces will cause shorter lag times and impact river levels downstream as well as localised flooding.
Send hill sites - the areas highlighted are landfill sites with methane gas discharge.

The sites are in permanent green belt area.

Southern county searches report E.2978.sn_hcp dated 5 jan 2005 identifies landfill site ref gu/12 with unrestricted waste. This causes great concern of what it contains.

I am concerned about the water table being disturbed and flooding to my property.

The traveller accommodation assessment purported to have been undertaken in 2012 by Mill Field Services is flawed as this company dissolved in 2011 according to Companies House.

There has been a lack of consideration to the deterioration of our historical villages.

The site is NOT large enough for its proposed use and Send Hill is a single track country road.

I object

What on earth do you lunatics think you are trying to do through forcibly granting building restrictions on land that has to be protected by people such as yourselves.

Stop this immediately
The inclusion of 400 homes and industrial warehousing at Burnt Common in the plan is new and not included in the regulation 18 draft.

I therefore object that a full impact assessment has not taken place.

A new four way interchange onto the A3 would be disastrous for Send. Send would be grid locked all day and the enlarged Send first school would become inaccessible as a local school and dangerous.

I object to Greenbelt areas around Ripley and Send being built on. These areas that are already crowded and short of schools, medical centres etc should rightly be preserved. The Portsmouth road is already busy though route from the A3. Building more housing and industrial areas will increase this problem exponentially.

I object to Policy A43.30 ha LAND AT GARLICKS ARCH, Burnt Common, designated for 400 houses and 7,000 square metres of industrial development including warehousing. There is no need for any additional houses given the 13,680 already proposed for the borough. This site is new and was not included in the Regulation 18 draft; neither has it been consulted upon previously. It is green belt permanently protected by the NPF which prevents the merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The proposed industrial development of 7,000 square metres is not required since the latest Employment Land Needs Assessment 2015 (ELNA) indicates a reduction of 80% in required employment floor space when compared with the previous draft plan. If it is felt there is a need for 7,000 square metres of industrial space then it should be developed at Slyfield. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be wholly disastrous for Send. Send road (A247) would be gridlocked all
day. Send would become the thru route to Woking for traffic leaving the M25 and A3 following the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. **Send cannot take it.**

I object to Policy A44.1.9 ha LAND WEST OF WINDS RIDGE AND SEND HILL designated for 40 homes and 2 travellers pitches. This site is **new** and was **not** included in regulation 18 draft and has **not** been previously consulted on. Development for housing is inappropriate due to its permanent green belt status and high quality green belt amenity within an area of outstandingly beautiful countryside which would undoubtedly be spoiled by any development. The subsoil of the existing site contains documented unsafe landfill waste which is currently vented. The proposal to include 2 travellers pitches is inappropriate due to the narrow width single track country road providing inadequate and insufficient access to the site.

**Attached documents:**

---

**Comment ID:** SQLP16/179  **Respondent:** 15136769 / NATS LTD (Sacha Rossi)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

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

Sacha Rossi

NATS Safeguarding Office

**Attached documents:**

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**Comment ID:** SQLP16/193  **Respondent:** 15140289 / Francis Pearse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()
I object. In particular the A44 proposal is detrimental to the local area, it wasn't consulted on and was added to the Local Plan a long way down the process. The sites being proposed for the travelers is known to have dangerous landfill and these need to be left undisturbed.

The increase in traffic on Send Hill Road, Potters Lane in particular will increase the likely hood of pedestrian danger and damage to the surrounding areas including personal property.

Modern housing and in particular traveller sites attract a higher proportion of vehicles and in particular trades related vehicles, vans, lorises, tipper trucks and trade related materials. This site is not conducive to this type of occupation.

Attached documents:

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**Comment ID:** pslp17q/299  **Respondent:** 15143937 / Helen Strudwick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

I am sadly having to write again to you as I don’t think that you have read my last letter. I was under the impression that I lived in a democracy and that the local councillors were elected by the people who live in a borough to serve them. They were in part elected on the basis of promises made to the electorate which as we all know, at least as far as planning is concerned, they have ridden roughshod over or completely ignored.

Tens of thousands of objections have been placed before you last year regarding the local plan and you not listened at all. Even allowing for the fact that further housing is necessary over the coming years it would appear that the area north of Guildford especially Send has been disproportionately targeted. At this point in time I understand that you will only allow objections to the changes you have made in the latest draft. With reference to the policies A42, A43 and A58 I object for the following reasons:

Attached documents:

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**Comment ID:** SQLP16/230  **Respondent:** 15146017 / Liam Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I object strongly to the proposed plans to removed Send from the greenbelt by building so many houses.

Attached documents:

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**Comment ID:** SQLP16/234  **Respondent:** 15146049 / Ian Tulloch  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (Yes)
I object that Send should be removed from the Green Belt. It provides a buffer between Woking and Guildford.

Attached documents:

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Comment ID: SQLP16/244  Respondent: 15147937 / julie rae  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

- I object to Send being removed the GreenBelt. Send is a small village that cannot take any more housing, the infrastructure & road systems are barely suitable for the current number of people and definitely cannot support more housing. I particularly object to the land between the 2 schools, including their playfields being taken out of the greenbelt.

- I object to the proposed development at Garlick’s Arch in Burnt Common. There is no need to additional houses in the borough on top of those already proposed. This site is new and has not been previously consulted on. The proposed new 4-way interchange onto the A3 at Burnt Common would be disastrous for Send. The road through send (A247) would be completely gridlocked during rush hours and would result in far too much fast moving traffic cutting through the village. It is already dangerous for children getting to school with the volume of fast moving traffic that don’t slow down by the school having left the A3. We cannot afford more traffic moving through the village and endangering our children.

Attached documents:

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Comment ID: pslp17q/401  Respondent: 15154977 / Janine Arthur  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

I object very strongly to the original Guildford Borough Proposed Submission Local Plan and the Updated Local Plan.

Cllr Paul Spooner, Leader of the Council, says: "We reviewed the comments from last year's consultation and made a number of significant changes to the plan and proposed sites, as well as updating the supporting evidence and policies. We remain committed to fundamental principles, such as our 'brownfield first' policy of proposing sites with past development, and some of the changes increase the number of homes in the town centre with reduced or removed housing sites in rural areas and greenbelt."

The above statement from Cllr Spooner is not reflected in the changes to the Updated Local Plan! Quite the contrary... the continued use of green belt land without sufficient exceptional reason is reckless and an abuse of our country's heritage.

Attached documents:

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Comment ID: SQLP16/261  Respondent: 15156609 / stewart Gibbons  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I would like to object to planned building of 700 homes per year, the area of Send does not have sufficient infrastructure to support this type of expansion. There are insufficient schools, road and transport system. Will destroy the village and its uniqueness, turn the whole area into a massive Conurbation.

The process which this has been proposed contravenes not only planning commitment and guidance as laid down by the government for green belt, but also has ignored due process.

I object to further development for the following reasons. With advent of the UK exit from the EU, the prediction for the requirement for housing and development of commercial units will need to be revised downwards. As the 3 million EU citizens currently in the UK, will be affected by this current event, and their ability to stay in this country will also be affected. So your estimates for further development of housing are wildly exaggerated and need to be revised downwards.

In addition to the potential down grade in the economy due to Brexit, your estimation for commercial and housing development is wildly exaggerated and unnecessary. Given you have allowed development of send marina; I really don’t understand how you can commit to further commercial developments. So therefore this development is folly this area does not need.

In particular, I want to object to all the following points:

I object to Garlicks Arch development of green belt land which contravenes government guide lines and that due process was not followed in the introduction of this development into this plan, and did not follow this process. Its inclusion in this plan was included at the last stage and did not follow process. So for that reason should be excluded.

I object to the council changing the enclosure of green belt land round the Ripley and Send villages, changing of village boundaries to allow for future development.

I object to the wholesale destruction of green belt land in this area (including development of 2000 homes at Gosden hill farm, Merrow, and also Send and Ripley), which contravenes directly the government stated commitment to preservation to green belt land.

I object to the creation of new north and South Bounds slips ways from the A3 to the A247 clandon Road (policy A243) at Burnt common, as in light of the wholly unnecessary due to planned expansion which unlikely be needed within the 10 years.

Attached documents:

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**Comment ID:** SLP16/266  **Respondent:** 15156673 / Emma France  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016  **Question 7:** Any other comments?

**Answer:** (Yes)

I object to the plans for additional housing in Ripley & Send. The areas chosen are not all suitable for building due to historic site usage and due to restricted access which will lead to additional traffic in an already busy areas. The impact on existing residents is unacceptable.

Attached documents:
Comment ID: SQLP16/268  Respondent: 15156673 / Emma France  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? 
Answer: (Yes) 

I object to this. 

GBC have not followed the correct process. Since 2014 GBC has changed every major site in Send proposed for development and now just added a massive new road junction. The 2014 proposal for 430 houses went down in April 2016 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

Attached documents:

Comment ID: SQLP16/1961  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry) 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? 
Answer: () 

These representations are made in respect 13.5ha / 33.4A of land to the west of Westwood Lane, Flexford (Plan Attached). The Site currently comprises a series of fields currently used for ‘horsiculture’. The land sits between residential properties to the north and the railway line to the south. The site’s character is indistinguishable from land on the opposite side of Westwood Lane to the east. The field parcels are of irregular shapes and sizes and feature mature trees at the boundaries. Consequently, the site is well contained physically and visually on all sides such that there are no long-distance views afforded beyond. 

Vehicular access can be gained directly from Westwood Lane into the site whilst there are two footpaths running east-west from Westwood Lane. These links offer an opportunity to connect the proposed Strategic Development Area to the wider footpath network and countryside beyond. Enhancements of this existing footpath network offering recreational opportunities would be possible as part of any development proposals. 

The site offers an ideal opportunity for the siting of low density development, specialist housing, retirement housing, or housing for elderly people such as a care home or extra care facility. Such low density development would act as a transitional development between the higher density core of the Strategic Development Area and the countryside beyond. Existing landscape features including the mature boundary trees would be retained to provide the new development with a ‘parkland’ setting. Such development would contribute to the requirements of Policy H1 Homes for All and the housing mix set out in the Strategic Housing Market Assessment. 

The site abuts the strategic development site to be allocated to the south of Normandy and north of Flexford (Policy A46). As such it benefits from the provision of infrastructure and improvements to the local highway network already identified within the Infrastructure Delivery Plan including projects LRN17,18, 19, EG6, WS4, WCT5, PED1 and SED3. Consequently additional development in the vicinity can contribute to and benefit from these infrastructure improvements. 

Attached documents: Location_Plan__Westwood_Lane__2016_07_15 (4).pdf (337 KB)

Comment ID: SQLP16/323  Respondent: 15182913 / Nicola Spurgeon  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? 

Section page number  Document page number  Page 94 of 147 1274
I object to the plan overall as I do not believe GBC have followed due process for this number of homes and there is not enough investment in the surrounding infrastructure to support the additional 485 homes. A new road system is not enough ... shops, schools & other amenities such as the Doctor's surgery will all be over subscribed.

Attached documents:
We would like to make the following comments in relation to the updated Employment Topic Paper that was published at the same time as the amendments to the proposed new Local Plan. In relation to paras 4.43-4.49 dealing with Send Business Centre and Tannery Studios, Tannery Lane, Send the following points are made:

1. At para 4.43 it is wrong to suggest that the 1.4 ha site identified in the earlier draft Local Plan is “undeveloped”. With reference to the Masterplan accompanying these representations it is clear that the land in question has been long established as part of the curtilage of the business premises and continues to provide important functions in connection with Send Business Centre such as for storage and access to the wharf: indeed there are already a number of buildings on the site already.

2. In both Topic Papers there is reference to the site previously being located in ‘high sensitivity green belt’ although the Plan now acknowledges that due to the unique circumstances that arise in the case of Send Business Centre, the site is suitable to be inset from the Green Belt. We question however, the initial assessment of the site’s location being ‘highly sensitive’, given that the site is sandwiched between 2 landfill sites from former mining operations. It is of course not a definition used in NPPF or other guidance from the Government regarding Green Belts. Moreover, it is neither within the AONB or AGLV and as referred to above part of the curtilage of long established industrial premises immediately adjacent to extensive former and worked out gravel quarries. In the circumstances, we believe it is wrong to describe the Green Belt hereabouts as ‘high sensitivity’. If it is based upon a subjective assessment on the purposes of including land within the Green Belt, then clearly the site today performs poorly in that regard since it is already substantially developed, its expansion will not lead to the merging of settlements (the nearest settlement to Send is Old Woking, but this is located to the north and separated from the site by extensive areas of undeveloped land), nor will it lead to encroachment onto the adjoining countryside since the site is contained within the curtilage of the existing business complex.

3. Para 4.47 of the Employment Topic Paper says that “There are existing buildings on the site, mainly unused.” On the contrary, all the buildings at Send Business Centre are fully occupied (other than a limited number of units presently being refurbished). The Masterplan explains why there is a need to provide additional accommodation to meet the demand from both existing and new tenants looking to either expand or relocate to SBC (see representations above and references in the Rural Economic Strategy).

Attached documents:

I Object there is too much traffic in our villages already.

Attached documents:
Comment ID: SQLP16/362  Respondent: 15241345 / Peter Relf  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

The roads are used as a rat run from Woking to M25 and A3 already and cannot take any more traffic than we already have. You are not caring regarding the quality of poor air we concerns local village people.

Attached documents:

Comment ID: SQLP16/368  Respondent: 15241729 / Mark Brackley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: (No)

I disagree with the suggestion to remove East Horsley from the greenbelt.

Attached documents:

Comment ID: pslp17q/411  Respondent: 15244097 / Persimmon Homes (Craig Hatton)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Answer: ()

There appears to be some confusion created by the conflicting Local Plan periods which are given at various stages in the draft Local Plan. The introduction section in Local Plan paragraph 1.2 states that the Local Plan is for the period 2013 - 2033 however within the Spatial Vision and paragraph 3.1, the plan is stated to cover the period to 2034 and this is the time period upon which the housing requirement is based. The plan period therefore needs clarification and is required to be clearly shown. There is no justification for the period to have been extended by a further year as most Local Plans should cover a twenty year period. Therefore, the plan period should cover the period 2013-2033 and this should be clearly shown. We would also advise that the plan period is shown on the front page of the Local Plan document to make this clear.

Attached documents:

Comment ID: SQLP16/424  Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP  Agent: Pegasus Group (Mike Spurgeon)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

Please see enclosed representations and supporting documents.
Overall Dwelling Provision

The reduced scale of dwelling provision and the revisions to the rate of delivery of new homes in the Borough (with higher rates anticipated later in the plan period), are concerning, particularly given the acknowledged shortfall in the rate of dwelling provision in recent past.

While it is acknowledged that this is designed to account for the provision of infrastructure in advance of new housing on larger sites coming forward, this does not afford recognition to the role of unconstrained sites which can provide housing in the initial years of the new Local Plan. The reliance on a higher rate of dwelling provision in later years rather than an annualised average of 654 dwellings per annum does not incentivise new residential development in the immediate future when it is most needed, not only to provide for established housing needs, but to address the substantial shortfall in dwelling provision in recent years against a much lower target. The extent of this shortfall is well established (hence the need to account for 20% buffer when monitoring delivery against a Five Year Housing Land Supply. Table 1 below highlights this over a 10 year period using figures obtained from Annual Monitoring Reports/Authorities Monitoring Reports.

[See attached document for table]
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/421</th>
<th><strong>Respondent:</strong> 15267521 / Land Owner of Hornhatch Farm</th>
<th><strong>Agent:</strong> Scott Brownrigg Planning (Natalie Walter)</th>
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<tr>
<td><strong>Document:</strong></td>
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<tr>
<td><strong>Answer:</strong> (Yes)</td>
<td>Please refer to letter dated 8th July 2016.</td>
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<td><strong>Attached documents:</strong></td>
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<th><strong>Respondent:</strong> 15269505 / James Adkins</th>
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<tr>
<td><strong>Answer:</strong> ()</td>
<td>Object to retention of “Land at Hornhatch Farm” as a Green Belt designation.</td>
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<td><strong>Attached documents:</strong></td>
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<tr>
<td><strong>Answer:</strong> (Yes)</td>
<td>I object to the plan for the following reasons:</td>
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<tr>
<td></td>
<td>1. The predicted housing needs are unvalidated.</td>
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</table>
2. The use of Green belt land for development is unsustainable and unnecessary.

3. Insufficient emphasis has been placed on cycling and walking strategies throughout the borough.

4. No reference has been made to the provision of student accommodation on University of Surrey campus - for which they have permission and have failed to build. This would relieve pressure on housing in the town.

5. Insufficient thought has been given to higher density accommodation on brownfield sites in the town.

6. The plan is illogical in saying there is a need to relieve traffic congestion but suggesting 65,000 sqm of retail space is needed - generating significant traffic movements. This space could be used for housing which generates less traffic.

Attached documents:
attach the GGG response below and support each and everyone of there statements, so please consider them to be my own response to the Local Plan.

Attached documents: 📄 GGG Objection to GBC Local Plan 15 July 2016 1.1.doc (716 KB)

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Comment ID: SQLP16/459   Respondent: 15273697 / Ray Briggs   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: (Yes)

There is a presumption in the plan that this will improve the quality of life of the local population. Given that the plan will lead to local overcrowding, a lack of adequate health care or education provision, a dilution of local facilities (particularly for children) and most especially a complete breakdown in the transport infrastructure not only of the borough but the surrounding areas, this cannot happen.

The area will be blighted by this plan, and the likely increase in people desiring to locate businesses in the area will not happen, because those businesses will locate in areas with a working transport net and where they can attract the right staff.

If implemented this plan will condemn both the Borough and the county to being part of the greater London conurbation, and the individual character of the county and this town will be lost forever. Those proposing this should recognise the damage they are about to inflict on their local community.

Attached documents:

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Comment ID: SQLP16/515   Respondent: 15273697 / Ray Briggs   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: (Yes)

I have already made comments which object to the local plan in various ways. I am advised that these will only register as objections if I use the word 'object' in them. Please be advises that all my comments indicate that I strongly object to the building of a large number of homes in the borough. I strongly object to the lack of a defined plan for infrastructure as it means that the consequences of the local plan are not addressed, and I strongly object to the lack of transparency in the evidence base for the local plan.

Attached documents:

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Comment ID: SQLP16/476   Respondent: 15274273 / Timothy Stevens   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()
I understand from the new local plan that the Guildford Borough Council are proposing removing the Green Belt status from Chilworth. I most Strongly Object to this. I also object to the poor level of consultation that has taken place with local residents.

It is another example that perpetuates the distrust of the public of both local and central government.

Attached documents:

Comment ID: SQLP16/482  Respondent: 15274465 / Marco De magalhaes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

Altho I understand the need for housing but why not use Brownfield sites or industrial sites for building? It would help the environment and bring a solution to house shortage.

Attached documents:

Comment ID: SQLP16/488  Respondent: 15274689 / Rebecca Brackley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: (Yes)

I object to the removal of Horsley from the green belt as this will be detrimental to residents' quality of life. Open spaces are important for health and well being. It is unacceptable for our villages to become part of the urban sprawl.

I object to the plan due to the lack of infrastructure in this area. Our schools are already over subscribed, the medical centre does not appear to have any more capacity (rooms for medical staff, parking etc) and our roads are already inadequate - they are narrow in places, with poor drainage and poor surfaces. The traffic is also heavy at peak times. The area already floods at times and more development will just make that worse.

I object to and disagree with the numbers of houses needed. I believe the approval of sensible very small scale developments and renovation of existing unused properties would be adequate for the needs of the village.

Attached documents:

Comment ID: SQLP16/514  Respondent: 15274945 / Philip Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()
I have made two specific comments on the plan, but wanted to say that in general it seems very reasonable and well thought through. I feel that it is time something happened to provide more housing and infrastructure in Guildford. Without additional housing, my children will have to move away from the area which we have been so lucky to be able to live in. I wish you all the best with this difficult consultation!

Attached documents:

Comment ID: SQLP16/507  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for members of the public.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?
It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leave some areas with less opportunity to do this than others.

Attached documents:

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Comment ID: SQLP16/511  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

Brownfield

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership.We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes.

Attached documents:

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Comment ID: SQLP16/513  Respondent: 15275233 / Aidan Dennis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: (Yes)

We need to stop building on the green belt
We need to stop building in sites where there is little or no road and rail infrastructure or where it is currently over loaded already: West Clandon, Ripley Ripley airfield, western end of Chilcott

Should not be seeking to build on farm land when so much brown field sites are available where infrastructure already exists

**Attached documents:**

---

**Comment ID:** SQLP16/526  **Respondent:** 15277217 / Corrie Wilkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (Yes)

I do not support the increased development of the Green Belt, as it exists in and around Surrey, to this level in proposed in the Plan documents. Specifically but not only, I object to the following areas of development (generally and not specifically);

**Ockham / Wisley Airfield** - I object to the imposition of a new village development of this scale and the corroborating assumptions. This is based on a number of factors, including but not restricted to transport, amenity, retail, schooling, environmental, density, local roads, impact on current services and villages. The local roads are insufficient to cope with increased residential and delivery traffic - the assumption that the population will travel by bike hire scheme to use the local trains is laughable - the impact on demand for local services and clubs deleterious to current provision (current residents are on waiting lists - what happens when 4-5000 more people land...?) - this will be the start of the in-fill of the land between all the villages (Ockham, Horsleys, Effingham) with a loss of amenity, environment, local character and the increase in pollution, waste, traffic, nuisance, inconvenience, urbanisation and irretrievable loss of Green Belt

**Development in The Horsleys** - I object to the significant number and increased provision of sites for medium / large scale housing projects in an around The Horsleys. There is insufficient capacity to absorb new developments in the area and it should not be acceptable for mass housing to be imposed in an area where public opinion is against it. The Horsleys are not a large metropolitan area, they do not have the services of a town or Cranleigh-size village and nor do they want them; by continuing to encourage concentration and development in and around these villages, the Council is agglomerating Effingham, The Horsleys, Bookham. Fetcham, Ockham into an homogenous residential area attached to Leatherhead, destroying the character of the Green Belt and passing the point of no return, by which time any control or restrictions on development are futile and the area becomes a suburban ribbon from London and Leatherhead / Guildford

I am opposed to the Local Plan

**Attached documents:**

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**Comment ID:** SQLP16/534  **Respondent:** 15278369 / Ripley Parish Council (Jim Morris)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** (Yes)

See reports attached.
I am representing St Mary’s Church, West Horsley, which has two adjacent properties at 80 East lane, West Horsley, KT24 6LQ.

These are St Mary’s Daughter Church, which you will see from Surrey Interactive has an ‘L’ shaped plot, and the adjacent Rectory (which itself borders farmland on its other side). (The two plots can also be seen on Site Allocation/Policy A41 and the map on Page 218 Of the Proposed new Local Plan.

For some while the Church has had internal discussions regarding ways to improve its facilities and planning for the future has become increasingly important as the Church grows and the influx of new residents into ‘The Horsley’s’ is set to significantly increase. So far, we have not reached any firm conclusions as to what we would like to do, but some form of improvement or redevelopment of the East Lane facilities is still high on our agenda for consideration. If any subsequent proposals required planning or any other consents, then all normal procedures would be followed.

For the time being however, we would be most grateful for your clarification and help. If you take the two properties together, they form a sizeable, almost square plot made up of the Rectory bounded on two sides by the ‘L’ shaped land upon which the Daughter Church sits. However, we have recently viewed a map which shows the new Settlement Boundary as part of the new Local Plan and it would appear that the bottom half of the Daughter Church land (i.e. the portion that runs along the back of both the Daughter Church and the adjacent Rectory) seems to be outside the proposed new Settlement Boundary. If this is the case, it could very significantly restrict our ideas in terms of improving the Church’s facilities; which of course are not only important for the Church members, but also the local community as a whole.

We would really appreciate it if you could look into this for us and confirm whether this is the case or not. If we are correct, then we would like to formally request as part of this consultation process please that this portion of our land is brought within the new proposed Settlement Boundary. If there is then a formal application process that we need to embark upon to achieve this, then please advise us and we would be pleased to follow your procedures.

Thank you

Simon Harris
For and on behalf of
St Mary’s Church
West Horsley
18.7.2016

Attached documents:
The plan is not thoroughly thought through!!

As it is it will cause even more gridlock.

The bus station & railway station must be brought together to create a transport hub. Railway station can't move therefore the bus station needs to be at the railway station.

Compulsory purchase the Casino nightclub & surrounding buildings. Build a pedestrian only walkway from the rail station/new bus station parallel to Bridge Street through the current Casino nightclub up a ramp into a new Friary shopping centre. The clubs on Bridge street close their Bridge street doors & open out onto the new walkway. During the day this could have outside tables & chairs outside restaurants and make more use of the river.

Expand the Friary to include a new Debenhams & John Lewis where the What Not Antiques/Bojangles/Old Post Office used to be. Demolish the current Debenhams and build restaurants making more use of the river.

Use brown field sites not green field for more housing! More housing along the A3 will cause far more congestion. Tunnel under Guildford for A3 is now needed. Plus being able to get on & off both ways at Burpham & Dennis roundabout. This will stop the needless flow of traffic along Ladymead, Parkway & Burpham. At Burpham the link road to Slyfield MUST happen.

Unused office space on London Road & Epsom road should be converted to housing or flats with sufficient parking.

I'm just stating the obvious to any Guildford resident.

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I object to any new building on GreenBelt land.
Comment ID: SLP16/622  Respondent: 15282689 / Waitrose Ltd (K Harrison)  Agent: Firstplan (Beverley Bateman)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: (Yes)

The following comments are submitted on behalf of our client, Waitrose Ltd, in respect of 'Question 7: Any other comments'.

There are various references in the Proposed Submission Local Plan: Strategies and Sites document to the delivery of the proposed Sustainable Movement Corridor (including in the Spatial Vision, at Policy I3 and in respect of a number of the proposed site allocations). As part of this Sustainable Movement Corridor, the Infrastructure Schedule at Appendix C sets out various alterations and closure of roads within Guildford Town Centre as part of the Guildford Town Centre Transport Package (Ref: LRN1).

Our client, Waitrose Ltd, has recently opened a food store in Guildford. The store is located on the northern edge of the town centre, within close proximity of the primary shopping area. Waitrose would like to take this opportunity to highlight the importance of ensuring that the proposed transport strategy referred to in the Plan does not in any way deter car-borne shoppers from using the new Waitrose foodstore. Any alterations to the existing road layout in Guildford which make the store less attractive to shoppers could adversely affect the viability of the store – particularly as the store is less than a year old and is therefore yet to become fully established.

In approving planning permission for the store, the Council recognised the ‘great potential’ it has for facilitating linked trips to other town centre facilities. The new Waitrose store therefore plays a vital anchor role in supporting the vitality and viability of the wider town centre. The proposed Guildford Town Centre Transport Package should not undermine this role by making the store less attractive to those visiting the site by car as this may in turn harm the health of Guildford town centre.

Attached documents:

Comment ID: SLP16/620  Respondent: 15282721 / Petronella van Winden  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

We are living in Cobbetthill road and we strongly object against the proposal to build over 1100 houses and a secondary school on two sites in Normandy and Flexford.

Already at the moment, Cobbetthill road is being used as a shortcut - cars are continuously speeding and this will increase dramatically if the build of proposed 1100 houses and a secondary school on two sites in Normandy and Flexford goes ahead.

Furthermore, the bottom of Cobbetthill road is at times subject to flooding - which also affects the already busy traffic. Again in case the build of proposed 1100 houses and a secondary school on two sites in Normandy and Flexford goes ahead the traffic will be horrendous.
I very much welcome a public consultation on the Local Plan - I understand not all local authorities undertake such a consultation and I am aware that often when public bodies consult the public there is a problem with inclusivity so my comment here is not a criticism of Guildford Borough but a very strong suggestion for the next Local Plan or even for this one if it can be delayed to allow the change I suggest to be incorported, as follows. A consultation should be a meaningful one in that it is equally accessible to all people in the public. The (understandable) complexity of the Plan documentation and the feedback method requiring free text typing will inevitably discourage many from participating. A very simple executive summary of what the Plan is (and one for each section too) with an even simpler listing of key actions (which are those considered to be ones that the public may have differences of opinion on) which can be given drop-down menus for options from which members of the public can chose their preferred approach. More participation can be encouraged by way of a welcoming, user-friendly front page signposting a click to the summaries and the key actions options perhaps contained in a simple (perhaps 20 minutes) questionnaire which could be so simple it could lend itself to being advertised elsewhere too (e.g. Surrey Advertiser). One very simple illustration of the uncertainty of the current version of the consultation is that, while saving the comments (including this one), an individual is left feeling the response may not be what is of interest to the surveyor, may not be given due consideration and, further, he/she may even be uncertain if he/she has particpated in the consultation at all without a 'submit' button. In order for a public consultation to be a true, wide-reaching and hence democratic consultation, it should be based on such simple questions and potential (defined) responses that the respondent will know that his/her repsonse has been entered/received, understood and will be given the appropriate (equal) weight as others.

**Comment ID:** SQLP16/635  **Respondent:** 15283041 / David Burgess  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I object to the lack of provision ofd local schools hospitals & doctors surgeries and the lack of provision for new roads

**Comment ID:** SQLP16/640  **Respondent:** 15291905 / Jo Hutchinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

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**Comment ID:** SQLP16/1651  **Respondent:** 15299201 / Samira Abdullah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

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The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

Attached documents:
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan".

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

Attached documents:
that will go ahead unchecked if we do not collectively oppose the local plan. How can this possibly be a democratic process when GBC have fundamentally failed in their duty to fully consult the residents of the borough?

I object to the GBC aspirations to grow Guildford into a substantially more urban sprawl environment with no regard for the beautiful landscape and historical environment so cherished by people far and wide.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly as it is not representative of how the majority of residents in the Borough wish to see their community develop over the next 15 years.

Attached documents:

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Comment ID: SQLP16/901  Respondent: 15389697 / Oliver Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

Attached documents:

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Comment ID: SQLP16/907  Respondent: 15390401 / William Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

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Attached documents:

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Comment ID: SQLP16/935  Respondent: 15400833 / William John Scott  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

A46. A47. A50.
In recent years the local lanes have become a rat-run for huge articulated vehicles which after interfere with traffic flow. Any further development in this area would cause chaotic hold- ups on the already crowded roads

Attached documents:

Comment ID: SQLP16/958  Respondent: 15407809 / Valerie Platt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

Ninthly I object to the whole 2016 Local Plan since firstly the consultation process is undemocratic, secondly because much of the information is inaccurate or misleading, thirdly most of the plan has been shown to be unsustainable with inadequate addressing of the infrastructure needs, fourthly no convincing argument for “exceptional circumstances” has been made to wreck the Green Belt which is a vital feature of our Borough.

In conclusion I urge the GBC to rethink the Local Plan so that it respects the views of local residents and listens carefully to their views.

Attached documents:

Comment ID: SQLP16/1004  Respondent: 15427745 / Barry Nelson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

The Plan does not have due regard to the Burpham Neighbourhood Plan 2015 adopted by GBC only last year.

Attached documents:

Comment ID: SQLP16/1818  Respondent: 15430049 / Michael Armstrong  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I object to the limited consultation period, especially as it is during a time when many people have organised their holidays etc.

I object to the last minute inclusion of new sites with less than 2 weeks notice, leaving people very little time or no time at all to even address their concerns. Most people have hectic lives and this must be taken into consideration in local plans.

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2121</th>
<th>Respondent: 15430049 / Michael Armstrong</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td>Answer: ()</td>
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<tr>
<th>Comment ID: SQLP16/1013</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td>Answer: ()</td>
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<tr>
<td>With the above in mind I would emphasise that I wish this plan to be turned down and for the council TO LISTEN TO THE OPINIONS OF THE RATEPAYERS FOR WHOM COUNCIL EMPLOYEES WORK</td>
<td>Attached documents:</td>
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<tr>
<th>Comment ID: SQLP16/1014</th>
<th>Respondent: 15433665 / Andrew Holley</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td>Answer: ()</td>
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<tr>
<td>Objections to the Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadow (TFM) – Allocation A35 for the phased development of a new settlement of 2,068 dwellings</td>
<td>Attached documents:</td>
<td></td>
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<tr>
<td>Although I am not a resident of Guildford Borough Council, I often visit my aunt and uncle in Ockham and enjoy the beautiful, unspoilt nature of the village and the surrounding area.</td>
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<tr>
<th>Comment ID: SQLP16/1103</th>
<th>Respondent: 15446273 / Jane Stevens</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td>Answer: (Yes)</td>
<td></td>
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<tr>
<td>I support site allocation policy A57. This site allocation is supported by draft Local Plan Policy H1: homes for all, sections 4.2.21, 4.2.22 and 4.2.29</td>
<td></td>
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</tbody>
</table>
In conclusion, I ask GBC to revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts of the former within the Borough.

Attached documents:

Comment ID: SQLP16/1112  Respondent: 15448289 / Paul Miller  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  
Answer: ()

I hope that the objections of residents will be taken into account, and diktats from central government will be challenged where they threaten the quality of life in this borough.

Attached documents:

Comment ID: SQLP16/1168  Respondent: 15455969 / Eloisa Latin  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  
Answer: ()

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.

Attached documents:

Comment ID: SQLP16/1170  Respondent: 15457505 / Julie Gray  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  
Answer: ()
I feel that common sense has not prevailed in this plan. A fortune has been spent on expensive consultants - yet the plan is aspirational, muddled and uses the Green Belt as a rule not an exception. The answers to plan are already in front of us, yet ignored. Use all the brown field sites (and there are more than enough) support SMES as our government dictates and build lots of smaller developments, which lessens traffic burden and spreads the housing load across the borough (not 50% within a 5 mile radius), make the University provide its own accommodation on its land and consult with the community in bite size chunks - not with an overwhelming document that is too difficult for people to understand. Make the plan fair, just and reasonable so that the communities are not being compromised and our green belt is not being eroded.

Instead plan for houses that are needed, gradually, in the right areas with a considered and reasoned approach – joined up thinking is lacking in the rush to produce an aspirational plan that frankly impresses no one, in fact the money wasted on this is beyond comprehension.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavor in order to protect the Green Belt.

Therefore WHY is this Revised Local Plan Unsound?

The Plan will not deliver sustainable development in accordance with the policies of the Framework. Rather it will lead to serious degradation of the rural environment, erosion and piecemeal development of vital Green Belt land, harm to heritage assets, intensification of use and urbanisation and access to new development principally by motor car, leading to congestion or upgrading of rural roads at the expense of rural character. The effect on existing and future residential communities will be diminution in social cohesion, reduced quality of life and substantial harm to the amenity. The overall housing land requirement in Policy S2 and the Proposed Delivery of housing in Table 1 of the Plan, as well as individual allocations in the Plan considered above, are not founded on a robust and credible evidence base. The planned 30% oversupply of housing sites will make monitoring impossible and will lead to a de facto housing requirement which significantly exceeds the OAN. Furthermore vital evidence is missing in parts.

Attached documents:

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Comment ID: SQLP16/1955  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

Residents wish to register concern and disappointment at the poorly judged decision to produce, promote and spend public money on a film to represent the views of “some residents”. A number of those “residents” represent institutions that have interests in proposed development that were not declared. There was no attempt to achieve balance. The film was inconsistent with the fair approach proposed in the Statement of Community Engagement. Use of the video on the Local Plan homepage could bias the Regulation 19 consultation. The suggestion that housing proposed will make a material difference to affordability or that congestion will be solved by development is to be tested. Indeed, the traffic evidence was not available when the video was produced and some of the data needed to assess congestion is not yet available.

Attached documents:
Re: Responses to Guildford Borough Proposed Submission Local Plan

(June 2016)

Over Arching Concerns

In 2014 I assisted my Mother in responding to the consultation on the ‘Draft Local Plan.’ She was then a resident of West Clandon. She has now moved to Burpham. My wife and I have recently moved to West Clandon in her stead. My mother had asked me to assist her in responding to your lengthy and overtly excessive public consultation, as I have recent experience as a Borough Councillor and Chair of Planning in a neighbouring Borough Council in Surrey.

As part of my role there I introduced and piloted the Core Strategy, as we chose to call it, in 2011. We were the second LPA in the Country to submit our plan to the Secretary of State. At the time GBC were entirely non-reactive to the requirement imposed by the former government to find 260,000 further homes in the South East. After virtually all the LPAs in the South East had submitted Local Plans, Core Strategies, call them what you will, to the Secretary of State under the original requirements, GBC had still failed to do anything of note. Certainly there had been no consultation, no draft plan of any sort and little if any effort made to sensibly engage with the need to release brown field sites for the provision of new housing quotas.

When, in 2014 you went out to consultation it was abundantly clear you did so in a rush and at a time when even the most myopic of LPAs could see Central Government shifting goalposts swiftly and with the NPPF constantly being amended and updated. The Case Law gave further pause for considerable thought, and yet GBC ploughed on with a Local Plan that was very clearly ill thought out and a knee jerk reaction following a prolonged period of total inactivity by GBC as the LPA. To put it in the words of a property developer I know well “GBC panicked and threw the marbles on the map. Wherever they landed they whacked in another 1000 houses to the SHLAA.”

As charitable as I have tried to be in my assessment of what has happened with the Planning Department at GBC, conscious as I am of the lack of resource available to Local Authorities, particularly second tier authorities in Surrey in light of recent news, I come to the inescapable conclusion that massive mismanagement is at the heart of the issues GBC now has with fulfilling the updated new homes requirements of Central Government.

Some might consider that pausing and critically assessing why GBC is in the situation it is in would be both sensible and necessary to avoid making the same mistakes. Unfortunately I see nothing save for a further ill-conceived head long rush to release previously unbuilt land and relinquish yet more green belt in an effort to meet a target you have taken almost no sensible approach in meeting.

There are significant brown field sites within GBC, there remain significant areas within the existing development curtailage. Yet there seems to be no intention of making those sites work for GBC and the Residents of GBC in meeting targets.

The inescapable conclusion is that by its own irrational mismanagement in the first place GBC has found itself unable and unwilling to devote the necessary time and decision making to coming to a sensible and proportionate approach to the Local Plan to 2027.

I am conscious of the significant governance issues that have dogged your Planning department for a number of years and have every sympathy with those who now have to cope with the mess left by others. However, it seems clear to me that whatever the outcome of the hastily and ill timed original consultation, the refusal to accept the information gathered therein and the re-arranging of an equally ill-thought through consultation process and amended Local Plan this time is highly susceptible to challenge via Judicial Review, a costly and unwelcome process as we all know.

I am deeply troubled to think that my Local taxing authority will be marching headlong into the kind of behaviours that are likely to lead to extremely significant costs in the Administrative Court and possibly beyond. It is ultimately tax
payers money that will fund such litigation. I am deeply troubled by how those charged with gathering and protecting our collective revenue are behaving in such a way as to put at significant risk not only our environment both built and natural, but also our money.

I accept that the requirements of Central Government are likely to lead to the need to release some green belt, but I fail to see how the wholesale release of huge tracts of GBC is either proportionate, necessary or in planning terms preserving the green corridors and open spaces which characterise not only GBC but Surrey as a whole.

The very significant and well considered objections formulated by residents both in West Clandon and beyond are set out below, as I am sure you are aware.

For completeness I endorse all those concerns set out below and adopt them as my own views and objections.

Attached documents:

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Comment ID: SQLP16/1222  Respondent: 15476641 / Tessa Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

The Council seems to have completely ignored the objections of Horsley residents to the previous local plan as virtually no account has been taken of these in the current draft plan. The planners appear to be preoccupied with what is legal and compliant (i.e. what they can get away with) rather than the interests and welfare of the people who currently live in the Horsleys or who will live there in the future. I am not objecting to having some increases in housing in the area, but the numbers must be more realistic and **appropriate infrastructure must be in place** to support the additional number of householders. I suggest that the Council:

1. Reduce the number of new houses to be built in the Horsleys by 45%
2. Include infrastructure planning in the local plan
3. Require all developers building new houses to contribute a substantial levy towards infrastructure development or to physically build schools, medical centres, car parks etc at their own expense. (This is commonplace in countries such as Singapore, Dubai and Abu Dhabi and would cost the Council nothing).

Attached documents:

---

Comment ID: SQLP16/1223  Respondent: 15476673 / Josh Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

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Attached documents:

Comment ID: SQLP16/1224  Respondent: 15476673 / Josh Hart   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

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Attached documents:

Comment ID: SQLP16/1225  Respondent: 15476833 / Peter Hart   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

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This government was voted in by the electorate on a mandate of trust. They have not been elected to carry out projects such as this which is a complete betrayal of the trust placed on them.

In simple terms this plan is a hastily presented “plan” more a collective dump of ideas with little wider consideration for people and future generations, the very opposite essence which you claim are the reasons for the plan.

Thank you for registering these objections.

I object to a Plan which has been generated in conjunction with developers who are seeking to line their pockets with no regard for the historic planning restrictions which have served the Community so well for so many years.

The real reason all these developers want to build round here is the return they get for their money. I object to any further erosion of our green belt to line the pockets of these money makers.
### Comment ID: SQLP16/1313  Respondent: 15497025 / Hartley Bishop  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

Whilst trying not to be too negative, I find little in the plan to commend it and believe it will have a detrimental effect on this and other nearby communities. In short I ask that the whole plan be re-considered.

**Attached documents:**

---

### Comment ID: SQLP16/1374  Respondent: 15509057 / Richard Golding  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**GENERAL COMENTS ON LOCAL PLAN**

This local plan is just a developer charter; The HMA has effectively been prepared by a Consultant to please developers, with the sole object of providing nice building sites in the remains of the Green Belt for 4/5bedroom houses. It fails to do anything for young people and totally ignores Guildford Town Centre except looking to add even more unwanted retail space, The figure of the number of homes required have been estimated way above the governments figures as prepared by the Office of National Statistics. This plan should be consigned to the waste bin.

**Attached documents:**

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### Comment ID: SQLP16/1388  Respondent: 15571745 / Hazel Thompson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I understand that development is needed and housing needs to be increased. However this needs to be done in a considered way that takes account of current communities, the environment, the sustainability of development and reflects the nature of the area. The proposed Local Plan does none of these. The last minute amendment of the plan to include the Garlick’s Arch area is the most prominent of these. It is imperative that the local plan is reassessed.

**Attached documents:**

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### Comment ID: SQLP16/1402  Respondent: 15573953 / Barbara Forrest  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

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**Answer:** ()

**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.

**Attached documents:**

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**Comment ID:** SQLP16/1429  **Respondent:** 15579457 / RSPB South East Office (Heather Richards)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**Housing figures**

The RSPB is using this question to highlight points that we have observed in our reading of the documents, but do not wish to raise formal objections to.

There appear to be inconsistencies in the presentation of housing numbers throughout the document. The Spatial Vision (p19) and Strategic Policy S2 “Borough Wide Strategy” both refer to the delivery of “13,860 additional houses by 2033”. In para 4.1.12 under policy S2, the text states “Table 1 shows a number of new homes that is greater than the figure in the policy”, but in fact the total in the table adds up to only 13,652, a figure 208 short of that specified in the policy. In addition, the detailed sites Table set out at pages 123-126 adds up to only 12,698 (1,162 short of the Strategic figure), even though it includes a windfall allowance of 625 houses over years 1-15 of the Plan. It is not clear why the figures are different.

Given the importance of this issue to the overall plan we request that the Council provides a brief statement clarifying where amendments to the documentation need to be made to ensure consistency. Alternatively a clear statement needs to be made to explain why the figures provided in the document are different.
**Monitoring indicators**

The RSPB notes the proposal to rely upon the “Amount of new SANG provided or funded” as a monitoring indicator, but considers that the sole proposed data source “Planning applications” does not provide sufficient detail to ensure that the mitigation is being delivered in a suitable manner. For the SANG regime to operate effectively it is essential that new SANG is delivered close to the new houses that are being built, and before the new houses are completed, so that they can influence the recreation habits of new residents. It is also essential that the quantum of SANG delivery matches (or exceeds) the rate of construction of houses – the mitigation cannot be considered to be properly delivered if there is a shortfall in its supply at any point.

As highlighted in the previous paragraph, a key element of the mitigation package is ensuring that mitigation is being delivered near to the new houses that are being built. The planning application information shows where houses are being consented, but it does not indicate where they are actually being delivered. The Council will need to select an alternative indicator to provide this information, but as it is responsible for administering all SANG funds gathered through section 106 agreements and through future CIL receipts it should be possible for it to use information about the income from developers and the expenditure from these funding sources to ensure that the appropriate amount of SANG is being delivered in the right locations at the right time.

**Habitats Regulations Assessment for the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (June 2016)**

In Box 1 (page 6), the reference to regulation 61(1) of the Conservation of Habitats and Species Regulations 2010 (as amended) should be changed to regulation 102(1) of the same regulations, which specifically covers the assessment of Local Plans.

**Attached documents:**

Comment ID: SQLP16/1431  Respondent: 15580065 / Deniz Kucukreisoglu  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?  
Answer: ()

In summary I am extremely disappointed that such a ghastly proposal is being considered and I am very strongly opposed to any consideration of further developments or reduction in green spaces in and around our beautiful villages and surrounding areas. Given the severe impact that this proposal will have on me and the quality of my living in my community, the outcome of this proposal will weigh very heavily on me.

I appeal and urge you to reject these development proposals to save, retain and maintain our irreplaceable communities and beautiful greenbelt for us and future generations.

**Attached documents:**

Comment ID: pslp17q/399  Respondent: 15585313 / Kim Styles  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?  
Answer: ()
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.

Attached documents:

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Comment ID: SQLP16/1525  Respondent: 15586017 / C Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

The Plan is supposed to be informed by residents and by parish councils and residents’ groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of ‘double speak’ has led to absurdities such as ‘affordable housing’ which is over £300,000 i.e. ten times the average salary; ‘safeguarding’ which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

‘About ancient woodlands, of course they are very attractive things, but they are ancient and trees don’t last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life’

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objectied to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?
It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

Attached documents:

Comment ID: SQLP16/1543  Respondent: 15587649 / James Masterman  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

I write with respect to the 2016 Draft Local plan, being a Guildford Borough resident living in Burpham.

In summary I find it in general unsound, and only aspirational in some critical aspects. Being over 1800 pages of high level prose, it is impossible for any resident to comment on fully. In some areas it is in white text on coloured background, making it even difficult to read. As such, as a "plan" for residents comment, about the future development of their borough, it is not really even fit for purpose.

Attached documents:

Comment ID: SQLP16/1585  Respondent: 15590529 / Linda Mumford  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

Come on Guildford you can do better than this, you have a duty to your residents to present us with sensible plans and not ones that seem to have been drawn up on the back of a cigarette packet to meet targets. If your local plan was marked it would get a FAIL from me. Give us something that doesn’t ruin the area with overdevelopment because you are too lazy or lacking in imagination to present something better

Attached documents:

Comment ID: SQLP16/1614  Respondent: 15595105 / James Beauchamp  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

As a resident of Send I am appalled at the proposals put forward in the Local Plan. The plan is supposed to be the result of the consultation process between the Borough Council and its residents. We have already put forward
our views during the process and have been totally ignored. It is not surprising that the people of this country have lost faith in our politicians (you guys).

Attached documents:

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**Comment ID:** SQLP16/1623  **Respondent:** 15596865 / Michael Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

Although appreciating that more housing is required in the borough, I do not think the Council have listened to its residents since the last draft plan was issued.

**Attached documents:**

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**Comment ID:** SQLP16/1664  **Respondent:** 15602177 / Julia Hunt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**Comment - Localism**

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Attached documents:

Comment ID: SQLP16/1701  Respondent: 15611553 / Edmund Hodges  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

The housing provision proposed in the plan should take account of the latest nationally based household projections and the housing provision proposed in Policy S2 for the plan period (2013-2033) should be increased to a minimum of 17,000 new homes. Provision for the additional new homes should be based on a strategic review of the policy constraints around Guildford.

Such a review should take account in particular travel distances to the town centre and other strategic employment locations.

Attached documents:

Comment ID: SQLP16/1863  Respondent: 15614817 / Jan Pearson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Answer: ()

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In my opinion, this is an extensive plan which deserves a concise review by some form of qualified panel which is not funded by the Council; thereby giving a reasonable opportunity to rebut, in a qualified/expert manner, many of the assumptions made in the plan, including the references to the various guidelines/regulations/etc. However, as a resident of over 30 years, and with a family I have brought up here, I do feel able to comment albeit on just a few specific points.

COMMENT: In order to be considered Framework compliant and therefore sound, more detail is required regarding each of the proposed allocations. In particular the Plan needs to clearly identify key sites which are critical to the delivery of the housing strategy over the plan period; identify which sites (or parts of sites) are considered deliverable and necessary to maintain a 5 year supply from the base date of 2018 and which are considered to be specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

Attached documents:
I have lived in Woking for the past 30 plus years and enjoy visiting all the areas named. I find the proposed local plan extremely unwelcome to this area.

I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by my family and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

Attached documents:

The Local Plan needs also to take into account the impact of leaving the EU, which at this stage is difficult to assess. It should therefore be put on hold until this process is fully resolved. In the meantime, development should be contained to existing town and brown-field sites, where it is lawful and appropriate. Councillors and other elected representatives at all levels need to look to the long term future and must conduct themselves with honesty and integrity for those they represent.

Attached documents:

The previous draft local plan was withdrawn after generating widespread local opposition. Mole Valley MP Sir Paul Beresford observed:

“This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough”.

Sir Paul’s commentary applies to the revised plan.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to
the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

**Attached documents:**

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**Comment ID:** SQLP16/1827  **Respondent:** 15639841 / May Craft  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**Conclusion**

Once development takes place on land, the change to the nature of an area is irreversible. Many appropriate non-Green Belt sites available within the borough which may be available for development and a number of these candidate sites are in public ownership: in order to comply with the NPPF and to ensure that GBC is able to optimise its cash position other candidate sites (particularly those within GBC or other public sector ownership) should be fully developed before any review of the Green Belt is undertaken.

GBC’s work to date seems to take little account of the impact central planning decisions will take. For example, given GBC’s ambitions for economic development do not give consideration to both the ultimate decisions regarding new airport capacity locally, nor the desire of the majority of the population (as reflected in the 23 July vote) which is likely to place significant curbs on population growth of economically active people.

Furthermore, GBC now needs to re-work its statistics following the decision made by the rest of the country (not the GBC residents) to seek to leave the European Union. We must expect that our politicians are going to reduce population growth, with a resulting easing of the pressure for new housing supply.

**Attached documents:**

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**Comment ID:** SQLP16/1813  **Respondent:** 15640705 / M J Azzopardi  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

I sincerely hope that all the views of residents in this wonderful part of the Borough are listened to and acted upon.

The area surrounding Burnt common, and Send should not be subject to such a range of disjointed development plans, they are in my opinion simply not workable in almost all instances.

**Attached documents:**

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**Comment ID:** SQLP16/1858  **Respondent:** 15657121 / Robert Wheeler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I am writing in regard to your scandalous plans to uproot and destroy the place that I have called home for 38 years. The changes to the local community should your plans take effect will quite simply be catastrophic for every resident who presently resides within the local area. It is true that real estate in Surrey seems to come at a premium these days, but that's because it's a nice place to live and is in a commutable distance of London. But the answer to the housing crisis is not to dig up the countryside and spoil the local area. The answer in my opinion is to encourage business to move from the South-East to other areas of the country where communities are crying out for commerce. Frankly the proposed changes lead me to wonder who exactly elected you lot to take office in the first place given that every one of the following points is so remotely dumbfounding its almost comical we are forced to write in and share our dissatisfaction with what you intend to create.

I mentioned how comical this whole plan is earlier. In many ways its like "the Goonies" revisited. We have the evil developers (that would be you lot), we have our group of Goonies (that would be everyone writing in objection to these plans) all were lacking is a Pirate Ship and a hit track by Cyndi Lauper. I just hope that like those fictional characters in that classic 80's movie our spirited rebuttal to your plans is good enough to see off the impending calamity that your so called local plan will impose.

In short your local draft plan is A VERY BAD IDEA. Hopefully this message will give you the clarity to wake up and do the right thing. LISTEN to your local community, common sense would suggest that we can't all be wrong.

I request that my comments are shown to the planning inspector and would appreciate confirmation that this communication has been received.

**Attached documents:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

Please refer to the accompanying separate representation submission report dated July 2016 for details

Attached documents: The Barn Effingham- Local Plan Reps (2).pdf (426 KB)

Comment ID: SQLP16/1997  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

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Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent, http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.
The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

Attached documents:

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Comment ID: SQLP16/2002  **Respondent:** 15688481 / Sally Lescher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

**ABSENCE OF POLICY ON RIVER WEY**

I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

- It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
- The special character of the landscape and townscape in the corridor is protected or improved;
- Views both within and from the corridor which contribute to this special character are protected or improved;
- Where appropriate, public access is provided to and along the River and the Navigations.

The Nature Conservation value of the site is protected or improved

Attached documents:

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Comment ID: SQLP16/2043  **Respondent:** 15703937 / Graham Vickery  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Answer:** ()

Finally, I object to the above matters not even being addressed in the plan and so showing a complete disregard for the long term well being of existing residents and rates payers who deserve far greater respect than GBC has shown them.

Attached documents:
Comment ID: SQLP16/2048  Respondent: 15704737 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

We need to see the Town Centre Master plan to enable viable comment. Currently I can only say that I object to the town centre plans but am unable to give you full detail as there is nothing to discuss.

Attached documents:

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Comment ID: SQLP16/2051  Respondent: 15705473 / Shane Ince  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Answer: ()

As a local resident and tax payer, I am strongly opposed to these developments and would urge you to take my views into consideration when deciding on the New Local Plan.

Attached documents:

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Comment ID: pslp17q/238  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

In the view of the GGG committee it is not sound. The changes do not take account of previous objections including the 32,000 other valid objections that are shown on the GBC website as made to the previous 2016 version. In terms of appraisal of the Local Plan it is vital that those objections are fully regarded, since many have not been taken on board.

As requested, this response reflects only comments on changes to the previous draft; both in terms of new text and also comments on deletions which lack acceptable justification. This is as a result of a specific instruction as given by the GBC Executive that only comments on changes will be acceptable. As a result, GGG requests confirmation that all of the objections to changes made below will be put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and also that all the previous objections to the 2016 draft plan made by GGG will be placed before the inspector and that when objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

Guildford is a constrained borough. 89% of its area is zoned as permanent Green Belt. The road network is already at capacity. We are concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. Approximately 70% of the new development proposed in this plan is in the permanent Green Belt.

In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft
deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

It appears that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In the opinion of the GGG committee much of the updated local plan still appears out of date. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health. There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians.

Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt.

Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

Attached documents:
1. Despite GBC’s claims 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. This is unacceptable, and raises questions of governance and vested interests.

Attached documents:

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I am objecting to changes in the plan as follows:

The site A43 Garlicks Arch would constitute a massive incursion on greenbelt land, made even worse by the increase to 400+ houses and would be extremely harmful or indeed destroy the nature of the rural villages of Ripley, Ockham and Send, causing them to coalesce into a conurbation.

The inclusion of 6 industrial sites/plots for storage of heavy machinery associated with travelling show people is entirely inappropriate. There is no indication of a need within the local plan or a need historically in the local area. Moreover, the scale of such a site would be indicated by a development of up to 1999 homes, which this plan does not propose.

The development of an industrial area gives no indication of the industries referred to (on the site A58 at Burnt Common). This is clearly a speculative plan to change the greenbelt into an industrial area and little detail is given for the justification for this, meaning it cannot be considered to be covered by a full consultation.

In addition, a Waste Management site is partially concealed within the A58 Burnt Common site in policy 4.4.23a and no proper consultation is indicated here either.

There is an increase of house numbers from 45 to 60 in an already unwelcome development at Tannery Lane, which will inevitably cause even more congestion in a sensitive and congested transport network around Ripley.

Overall, this Local Plan as suggested for Ripley and surrounds constitutes a grandiose and unwelcome development which impacts severely on a rural area, and these changes make it worse.

Attached documents:

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Apart from the over exaggeration and estimate of housing units required (12,426 homes are not justified even for an over estimated 20,000 extra residents as this would assume many 1 bed flats and not 1,000's of 3/4 bed homes).
The combination of site A25 Gosden Hill encroaching higher up the A3 in the last plan and the introduction of A43/A43a Garlicks Arch in Send completely destroys the very essence of the Green Belt reasoning to stop urbanisation and the joining of distinct town/village boundaries. Effectively the plan as it stands destroys the Green belt protection zone between Guildford/Burpham and the villages of Send and West Clandon effectively become part of Guildford in a very visual way. This is over-development of the Golden Hill site which should be scaled back significantly leaving more green belt land between it and the villages north of it, any A3 north/south access should be at Gosden Hill/Burpham interchange along with any Slyfield redevelopment of the access to the A3 and Garlick's Arch should be removed from the plan completely along with any plans to turn the A247 Clandon Road junction into a north/south junction which would significantly increase the traffic flow through the villages of West Clandon/Send and Ripley and more accidents at the accident hot spot connecting to the A3.

Over development of A25 and A43(a) completely go against the principle of the green belt policy to stop urbanisation and connecting of surrounding villages into key towns.

Attached documents:
I am writing on behalf of the Surrey/Hants Borders Branch of CAMRA, the Campaign for Real Ale, in relation to the above consultation.

You will recall that I submitted comments on policies E5, E8 and E9 in response to last year's consultation exercise. I do not consider these comments and suggestions to have been addressed in the latest version of the Plan and I therefore understand that these will be passed onto the Inspector for consideration.

I would however also like to pass comment on the changes you are proposing with respect to Policy E5 and Policy E9. Both Policy E5 and E9 have been amended to provide additional protection against the loss of shops and services and I would ask that consideration is given to extending this change to also include public houses (ie, Class A4). Pubs are essential to the well-being and community cohesion in both rural and urban areas, where facilities are scarce and transport links typically poor. Whole communities often have a single pub to act as the focus of the community; it is essential that they are retained where viable and giving this additional level of protection would help in this regard.

Attached documents:  
Guildford Local Plan Changes Consultation response July 2017.doc (18 KB)

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Comment ID: pslp17q/230  Respondent: 17348225 / Thakeham Homes (Katherine Munro)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

Objection photos

Attached documents:  
2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane Appendix 2.pdf (4.6 MB)
2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane Appendix 1.pdf (1.3 MB)

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Comment ID: pslp17q/247  Respondent: 17368705 / Reginald and Mavis Perryman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

The Local Plan needs also to take into account the impact of leaving the EU, which at this stage is difficult to assess, although it may result in a reduction in the local population if some EU citizens return home. It should therefore be put on hold until this process is fully resolved in 2019.

In the meantime, development should be contained to already available town and brown-field sites, where it is lawful and appropriate. Councillors and other elected representatives at all levels need to look to the long term future, and take into account not just our area, but the overdeveloped south of England as a whole.

Attached documents:
REPRESENTATIONS TO GUILDFORD BOROUGH COUNCIL'S PROPOSED SUBMISSION LOCAL PLAN JUNE 2017

Berkeley Homes has been working alongside Howard of Effingham School for a number of years to deliver much needed housing and a new school to the area. These sites were allocated for development in the Draft Local Plan 2014 but refused planning permission by Guildford Borough Council in March 2016. Consequently, an appeal was lodged against this decision and a public inquiry was held in May 2017. The suitability of the sites has been demonstrated through the inquiry and accordingly, we believe the sites should be included in the Guildford Local Plan as Site's Allocated for Development - for the provision of a replacement Howard of Effingham School and up to 295 residential dwellings.

Following the recent appeal decision on land at Long Reach for the provision of a Suitable Alternative Natural Greenspace (SANG), Guildford has the opportunity to release housing sites in that part of the District and allocating the Howard of Effingham / Lodge Farm site would assist in delivering homes in this part of the District, including the provision of much needed affordable housing.

You will be aware that the Local Plan will be tested by the Inspector against the four tests of soundness (National Planning Policy Framework (NPPF) para 182), namely that it is positively prepared, justified, effective and consistent with National Policy. We set out below why we are of the view that the Proposed Submission Local Plan does not meet these tests in relation to the Spatial Strategy (Policy S2), Affordable Homes (Policy H2), the Green Belt (Policy P2), and Infrastructure Delivery (Policy ID1).

Conclusion

As a whole, the Proposed Submission Local Plan June 2017 is greatly flawed. The currently proposed phasing of housing and spatial strategy will not deliver Guildford's Objectively Assessed Needs within a reasonable timeframe, if at all. The recently granted SANG at Long Reach also releases housing capacity in this part of the Borough and accordingly, the District wide allocations should be reviewed as a whole to ensure appropriate distribution. The previous Draft Local Plan (2014), substantially based on the same evidence, allocated Howard of Effingham School, Effingham Lodge Farm and Brown's Field (Site Allocation 69) to provide homes and a bigger school. This allocation has been removed but remains an appropriate, deliverable and sustainable means of meeting the Borough's need for new infrastructure and homes. We will continue to seek to work with Guildford Borough Council and Effingham Parish Council to bring forward the delivery of the Effingham sites and are happy to discuss the above points further.

Attached documents:

As a resident of Clandon Road, Burnt Common i find it incredible that GBC have failed to listen to the residents of Send and Burnt Common who previously in force have objected to the proposed Local Plan. Instead you seem to have made further changes that result in more development rather than less, failing in the duty of GBC to listen to residents.

It seems that you are simply ‘testing’ the patience of residents by repeatedly making further changes without realising that your proposals are completely unacceptable. It is unjust that you are focussing a disproportionate level of development in and around the Burnt Common and Send compared with our areas of the Borough.

Attached documents:
I am writing to object to the latest draft local plan. I note that you are only accepting comments to the changes versus the previous plan, so I would ask you to read my comments below in conjunction with those that I have already written to you about in 2016, when you published the previous set of proposals. I have attached a copy of this letter for your ease of reference.

I have been a resident in Send for over 20 years and have seen how strongly local people feel about the proposed changes to our village. This included raising a large proportion of the objections to the previous plan as well as electing two Borough Councillors who primary objective is to save Send’s Greenbelt status. However, it appears that none of these objections have been taken into account at all. If anything Send seems to have been unfairly penalised for this activity with the inclusion of even more development in the latest version of the plan, making things even worse for our village.

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I have detailed my objections to specific policies below, but having drawn a - somewhat rudimentary- map of all the proposed development the impact of the changes can be seen in their entirety (See attachment) This map does not illustrate the additional impact on traffic and other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

Attached documents:
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Attached documents:

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**Comment ID:** pslp17q/342  **Respondent:** 17424513 / Katherine Ray  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

There also appears to be no proposal to introduce commensurate infrastructure upgrades e.g. medical, educational and transport services to cope with the increased number of residents. Furthermore the proposed Wisley Airfield redevelopment is a step too far.

It is also puzzling that like a lot of other Borough and District Councils in Surrey, the number of new homes proposed in the Guildford Borough Plan well exceeds the numbers required by HM Government.

Attached documents:

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**Comment ID:** pslp17q/344  **Respondent:** 17424801 / Gregory Webb  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

I am very disappointed to see that despite the massive number of valid objections raised by our villages’ local residents within the 2016 consultation, the Borough Council has deemed it fitting to increase the housing, travelling/showpeople pitches and industrial development allocations in the villages despite a reduction in the borough’s overall target.

With the proposed proposals for 3,700 homes at Gosden Hill Farm and Wisley airfield (Policy A35) in the immediate vicinity and the specific proposals for the villages of Send and Send Marsh/ Burnt Common to accommodate an extra 500 houses, 10 travellers pitches, 7,000+ sq.m of industrial development and slip roads to the A3, **I hereby strongly object to every single one of these proposals on the grounds of their severe and adverse environmental (including atmospheric pollution from the increased traffic) impact and the unjustified sacrifice of prime agricultural Green Belt land and historic woodland.**

Attached documents:

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**Comment ID:** pslp17q/350  **Respondent:** 17425569 / Jack Cross  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
My objections to the amended draft 2017 Guildford draft Local Plan are below. I would like confirmation that the comments below, and those previously submitted, will be passed onto the Inspector.

I would like to make clear I am not anti-housing, nor do I believe in “pushing the problems elsewhere”. I believe GBC have a duty to ensure that every town and village needs to provide housing for local people, proportional to its population, in all urban, rural, Green Belt or AONB areas instead of greatly disliked and, in some cases, totally unsustainable sites.

It is unfortunate that GBC have not taken into consideration the unusually large number of comments (32,000) on the 2016 Local Plan. It would be courageous of GBC to review their housing needs in light of the flawed studies they have used and taken into consideration the consequences of the current Brexit climate and inevitable change in housing need. It would be wonderful to say “I agree” instead of “I object”.

Attached documents:

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Comment ID: pslp17q/367  Respondent: 17433665 / Nancy Hamilton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?  
Answer: ()

As a whole the 2017 plan fails to follow NFFP para 17 core planning principals and does not ‘contribute to conserving and enhancing the natural environment and reducing pollution’. There are fundamental errors made in requirements for housing and employment based on the source documents e.g. SHMA and ELNA. The data sources do not show empirical evidence for the changes in the UK’s housing and economic status after it leaves then European Union. The UK population has voted to make a significant change to the country’s economy and population and the impact of Brexit on the local area must be accurately evaluated or else the entire basis of the local plan is flawed.

Attached documents:

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Comment ID: pslp17q/374  Respondent: 17434785 / Steve Nicoll  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?  
Answer: ()

Having previously objected to the original plan I would also like to record my further objection to the draft plan as it has such a detrimental impact on Send/ Ripley and the surrounding areas. What I find astonishing is the complete contempt and disregard for the quality of life shown to the residents of Send and Ripley by Guildford Borough Council (GBC) that will have to suffer in the long term the changes that are being proposed.

The sheer aptitude and lack of compassion by GBC for the existing residents holds no relevance in the ambition of GBC to increase the population particularly of Send by up to 50%. One can only imagine the disastrous impact this would have on the quality of life and of not only the existing residents but if the plan were to go ahead then the quality of life for those moving into the village.

The other main objection I have is to the A3 works at Burnt Common. I’m sure that GBC have already analysed the amount of traffic that passes from West Crandon and through Ripley having exited the A3 as it makes it way east through
send along to Old Woking. The road is at over capacity during rush hours as it is and to be honest if Burnt Common become and on and off ramp for the A3 the Send Village will become a carpark not only at rush hour but all through the day. One can only imagine the quality of life for those living along Send Barns Lane and Send Road. The noise and pollution from vehicles would be unbearable and no doubt exceed all pollution levels with diesel and petrol fumes.

Attached documents:

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**Comment ID:** pslp17q/377  **Respondent:** 17440705 / Chris Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Answer:** ()

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

1. **GENERAL OBSERVATIONS**

The latest proposed plan is considerably worse than the previous plan and I am very disappointed in GBC and I’m much more critical of the Local Plan proposals.

As residents of Send Marsh, we share the same views of that of our neighbours in Send and Ripley. Every time we are asked for our opinion we make it very clear by way of a massive response that so many of the proposals are ill conceived and impractical to apply in our particular area.

GBC seems to be either unwilling or unable to act upon the feedback and opinion which is so clearly voiced by the residents.

We in Send Marsh have repeatedly expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before plus an additional eight Show people pitches.

The Conservative Manifesto for GBC states:

“Deliver a new Draft Local Plan taking into account constraints, residents’ views and protecting the green belt”.

It would appear that for the villages of Send, Send Marsh and Ripley, GBC are failing on two of these;

**Failing to take into account residents’ views**

and

**Failing to protect the green belt.**

This continual disregard of local public opinion is very disappointing and GBC needs to create a significantly better plan than this one for the area we live in.

Attached documents:

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**Comment ID:** pslp17q/402  **Respondent:** 17445697 / Dorothy M. August  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
I am writing to object to the Proposed Guildford Local Plan 2017 and in view of what’s being proposed, it is clear that Guildford Borough Council has not listened to over 30,000 objections to the Guildford Local Plan 2016. The 2017 Plan is substantially the same as the 2016 Plan:

- four of the original 6 housing development sites remain
- potential 2500 houses on the former Wisley Airfield and fields as well as Gypsy/traveller pitches
- Employment/retail space
- Two schools all remain unchanged after objections to Local Plan 2016

Attached documents:

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Comment ID: pslp17q/408  Respondent: 17447329 / Justin Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

I am writing to object to the latest draft local plan. I note that you are only accepting comments to the changes versus the previous plan, so I would ask you to read my comments below in conjunction with those that I have already written to you about in 2016, when you published the previous set of proposals. I have attached a copy of this letter for your ease of reference.

I have been a resident in Send for over 15 years and have seen how strongly local people feel about the proposed changes to our village. This included raising a large proportion of the objections to the previous plan as well as electing two Borough Councillors who primary objective is to save Send’s Greenbelt status. However, it appears that none of these objections have been taken into account at all. If anything Send seems to have been unfairly penalised for this activity with the inclusion of even more development in the latest version of the plan, making things even worse for our village.

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I must illustrate the additional impact on other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

Attached documents:

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Comment ID: pslp17q/438  Respondent: 17457825 / Wisley Action Group (H M Jefferies)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Answer: ()

The present consultation follows the 2016 consultation under regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. It deals with proposed changes to the 2016 submission local plan. The 2016 submission
local plan has not been withdrawn and the current exercise is not a further regulation 19 consultation but an informal exercise into proposed modifications which the Council intend to put before the examining inspector.

The Council decided on 16th May 2017 for ‘such consultation to focus specifically on the proposed changes highlighted in the document’. Accordingly the consultation page on the website https://getinvolved.guildford.gov.uk/consult/ti/pslpss17/consultationHome explains:

“The council is inviting comments about the Proposed Submission Local Plan: strategy and sites 2017 from 12pm (noon) on Friday 9 June to 12pm (noon) Monday 24 July targeted on just the proposed changes to the plan.

After the consultation, the Council will submit the plan for examination by an inspector. Only comments about changes to the plan will be passed on to the inspector from this consultation. The inspector will also receive the comments from the 2016 consultation, so will get the complete picture of comments about the submitted Local Plan.

You can make general comments about the proposed changes to the plan, but the Council is also asking for specific comments relating to legal compliance, soundness and the Duty to cooperate.

Have your say on the Proposed Submission Local Plan: strategy and sites 2017. You can:

• make general comments about proposed changes to the plan as a whole and supporting documents by completing the online questionnaire below and/or
• make comments about proposed changes to specific sections of the plan by reading the online version of the plan below and by using the comments forms embedded throughout the document” (original emphasis)

The Council report for 16th May 2017 says that ‘comments made to parts of the plan that are unchanged should be considered not duly made’ (para 4.6). The local development scheme and the Council report (para 4.4 to 4.6) refers to this as a ‘targeted Regulation 19 consultation’. That is incorrect. A regulation 19 consultation is on ‘the local plan’ (see regulations 17, 19 and 20) not parts of it which have changed from an earlier regulation 19 consultation.

A number of consequences follow:

• The local plan which is intended to be submitted to the Secretary of State is the 2016 submission local plan;
• The changes proposed in the 2017 document can only be made if:
  • The Inspector finds that the 2016 local plan is unsound;
  • The Council asks the Inspector to recommend modifications to cure the unsoundness; and
  • The Inspector exercises his or her discretion to recommend the changes which the Council have proposed rather than any other changes to make the plan sound;
• The 2017 changes proposed by the Council have the same status as any other changes proposed to remedy unsoundness in the 2016 plan;
• Representations can be made seeking changes which are consequences of or alternatives to the 2017 proposed changes.

The proposed changes

We note that there is no explanation in the 2017 local plan document or the Council report as to why the 2016 plan is unsound, the ways in which it is unsound, why the proposed changes would render the plan sound and why they are the best changes to make. WAG of course consider that the plan is unsound.

Wisley Action Group will take up the entitlement to be heard at the examination on the proposed changes: Procedural Practice in the Examination of Local Plans (June 2016, 4th Edition v.1) paragraph 5.22, footnote 10.

Attached documents:
It is very disappointing that the 2017 version of the Local Plan remains virtually unchanged from the 2016 version despite 32,000 comments from the Borough’s residents being sent in last year. That the revised Plan still relies on inaccurate evidence is concerning, particularly where it distorts estimates of housing needs for the life of the Plan.

Attached documents: